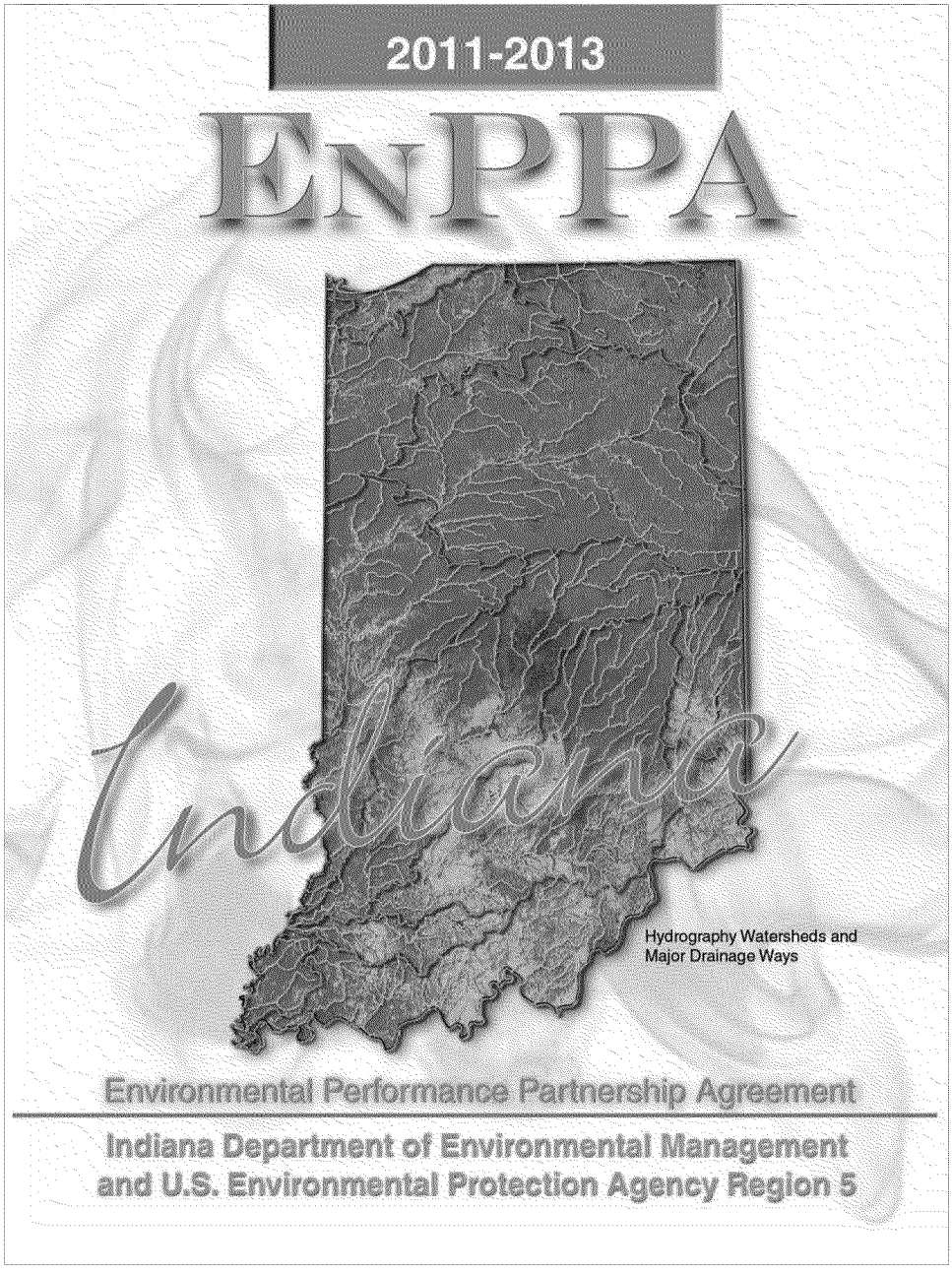
Indiana Department of Environmental Management
Final Environmental Conditions (FEC) Report
Environmental Performance Partnership Agreement
2011 - 2013



December 2013

Air Quality

Air Permits Branch

Title V Operating Permits (TVOPs)		A-1
Contact(s): Matt Stuckey	U.S. EPA Contact(s): Pamela Blakley	Due Date: June 30, 2012
U.S. EPA Role: Provide program assistance.		
Goal 1: Taking action on climate change and improving air quality. **Objective 1.2: Improve air quality.** **Funding: State**		

Issue all TVOPs in a timely manner consistently with federal and state requirements:

a) Track progress of all TVOP applications received by IDEM.

STATUS: Ongoing.

The Title V Operating Permits (TVOP) application counts below include administrative permits for consistency in historical counts. Some secondary sources in combined relationships had their first-time TVOP subtypes changed to administrative TVOPs where necessary.

- Total of 48 permits issued for applications received during period December 1, 2001 – December 31, 2004; however none of these permits were issued during the reporting period ending June 30, 2013.
- Total of 40 permits issued for applications received during period January 1, 2005 – December 31, 2006; however none of these permits were issued during the reporting period ending June 30, 2013.
- Total of 32 permits issued for applications received during period January 1, 2007 – December 31, 2008; however none of these permits were issued during the reporting period ending June 30, 2013.
- Total of 23 permits issued for applications received during period January 1, 2009 – December 31, 2010; one of these permits was issued during the reporting period ending June 30, 2013.
- TVOP applications received January 1, 2011 – December 31, 2012:
  - Total of 30 permits issued, three of the 30 permits were administrative permits.
  - Two pending applications.
  - Three withdrawn applications, one combined permit.
  - Thirty-six applications total received; three of the 36 were for administrative permits.
  - All 30 permits were issued in less than 546 calendar days.
- TVOP applications received January 1, 2013 – June 30, 2013:
  - A total of three applications were received. All three permits were issued within 546 calendar days. None of the three were administrative permits.

CHALLENGES: No challenges encountered.

b) **Timely issuance of all Title V operating permits – IDEM will ensure that progress is made on all pending initial TVOP applications.**

STATUS: Ongoing.

Eighteen TVOPs were issued from July 2012 through June 2013 (FY13); of these, 17 TVOPs were issued within 546 calendar days. (Does Not Include Administrative Permits)

CHALLENGES: No challenges encountered.

c) **Timely issuance of all Title V permit renewals – IDEM will ensure progress is made on all pending TVOP renewal applications so that these renewals are issued prior to the expiration of their current TVOP or for late applications are issued within nine months of receipt of the application.**

STATUS: Ongoing.

130 Title V renewals were issued during period July 1, 2012 - June 30, 2013. Of these, 70 were issued within 270 calendar days and the remaining 60 were issued in more than 270 calendar days. There were 98 Title V renewals pending as of June 30, 2013. Of these, 25 were administratively extended as of June 30, 2013 (more than 270 calendar days), and 73 were not extended as of June 30, 2013 (less than 270 calendar days). (Does Not Include Administrative Permits)

CHALLENGES: No challenges encountered.

d) **Provide quarterly updates to the Reasonably Available Control Technology/Best Available Control Technology/Lowest Achievable Emission Rate (RACT/BACT/LAER) Clearinghouse.**

STATUS: Ongoing.

In May 2012, IDEM began using U.S. EPA's Standalone Editor to submit entries to the RACT/BACT/LAER Clearinghouse (RBLC). IDEM has submitted 37 RBLC entries to U.S. EPA.

CHALLENGES: Lack of resources and complications with U.S. EPA's RBLC entry system have proven to be challenging. The Standalone Editor makes the process simpler and less time consuming.

e) **Provide semi-annual updates to the TOPS database.**

STATUS: Ongoing.

IDEM provided the last semi-annual report for the period January 1, 2013 - June 30, 2013 on July 26, 2013.

CHALLENGES: No challenges encountered.

Title V Operating Permitting (TVOP) Program		**A-2**
Contact(s): Matt Stuckey	U.S. EPA Contact(s): Pamela Blakley	Due Date: To be established.
U.S. EPA Role: Work with IDEM, U.S. EPA and OAQPS to grant Title V program approval.		
Goal 1: Taking action on climate change and improving air quality. **Objective 1.2: Improve air quality.** **Funding: State**		

a) **Approval of Indiana's TVOP program.**

STATUS: Ongoing.

Indiana's original TVOP Program was approved by U.S. EPA in 2001. On June 14, 2010, IDEM sent a letter to U.S. EPA R5 withdrawing the 2002 submittal of its Title V Program revisions. U.S. EPA and IDEM are committed to working together to support IDEM's development of federally approved rules.

CHALLENGES: No challenges encountered.

b) **U.S. EPA will provide support and guidance to IDEM on permitting high efficiency energy generation initiatives.**

STATUS: Ongoing.

There was one permit issued during this period to Indiana Gasification, which U.S. EPA reviewed.

CHALLENGES: No challenges encountered.

c) **U.S. EPA will provide support to IDEM in developing and issuing flexible permits.**

STATUS: Ongoing.

U.S. EPA has provided technical assistance and guidance on specific issues related to flexible permits. There are no flexible permits pending at this time.

CHALLENGES: No challenges encountered.

Article 2 Rule Revisions		**A-3**
Contact(s): Matt Stuckey	U.S. EPA Contact(s): Pamela Blakley	Due Date: To be established.
U.S. EPA Role: Work with IDEM, U.S. EPA and external stakeholders to evaluate, develop and approve revisions to Indiana's air permitting rules (326 IAC 2).		
Goal 1: Taking action on climate change and improving air quality. **Objective 1.2: Improve air quality.** **Funding: < 10% Federal/State**		

a) **U.S. EPA will assist IDEM in its efforts to assess current air permitting regulations and determine areas that require revisions to provide more clarity, consistency and allow for efficient implementation of these regulations. U.S. EPA will provide guidance and assistance to ensure that the revisions will ultimately be approved as part of Indiana's State Implementation Plan (SIP).**

STATUS: Ongoing.

A representative of U.S. EPA R5 attended one workgroup session. Subsequently, U.S. EPA determined that they could not be directly involved in the workgroup discussions, but offered to provide technical and/or legal assistance directly to IDEM. Several revisions have been finalized or are in the process of being approved and finalized.

CHALLENGES: Work on this has been delayed due to resource issues. Office of Air Quality (OAQ) intends to hire additional employees who will oversee this activity.

Air Compliance and Enforcement Branch

Compliance Monitoring Strategy (CMS) for Title V and Federally Enforceable State Operating Permit (FESOP)		A-4
Contact(s): Phil Perry	U.S. EPA Contact(s): Brent Marable, Debra Flowers and Rochelle Marceillars	Due Date: September 30, 2013
U.S. EPA Role: Review Clean Air Act Stationary Source Compliance Monitoring Strategy (CMS) Policy and work closely with OAQ staff to insure any issues are satisfactorily addressed.		
Goal 5: Enforcing environmental laws. **Objective 5.1: Enforce environmental laws.** **Funding: Federal**		

Develop and implement the CMS plan for Title V and FESOP source inspections and FESOP source and compliance evaluations consistent with the September 2010 Clean Air Act Stationary Source Compliance Monitoring Strategy.

a) **Submit CMS plan for review and negotiation with U.S. EPA by August 31, 2011, and August 31, 2012. Implementation of the final CMS plan will begin the upcoming FY12 on October 1, 2011, and October 1, 2012. The CMS plan should meet the 2011 CAA Stationary Source CMS policy. The CMS source category and frequency flags in the Air Facililty System (AFS) database will be completed by IDEM for the Title V major and synthetic minor with the potential to emit at or above 80% major source threshold (SM80) source universe by December 15, 2011, and December 15, 2012.**

   STATUS: Complete.

   The FY12 CMS plan was submitted to U.S. EPA on August 31, 2011. The plan was negotiated and accepted by U.S. EPA on January 13, 2012. IDEM began implementation on October 1, 2011. An update of the FY12 CMS plan implementation is covered by items c –k below. The FY12 CMS category (A, M or S) and frequency (2, 3, or 5) flags were placed in AFS in October 2011.

   The FY13 CMS plan was submitted to U.S. EPA on August 30, 2012. The plan was negotiated and accepted by U.S. EPA on November 30, 2012. IDEM began implementation on October 1, 2012. An update of the FY13 CMS plan implementation is covered by items c-k below. The FY13 CMS category (A, M or S) and frequency (2, 3, or 5) flags were placed in AFS in October 2012.

   CHALLENGES: No challenges encountered.

b) **U.S. EPA shall submit a written response to IDEM concerning the CMS plan by December 31, 2011, and December 31, 2012.**

   STATUS: Complete.

   U.S. EPA's written response was received by IDEM on January 13, 2012 for FY12 and November 30, 2012 for FY13.

   CHALLENGES: No challenges encountered.

c) **Implement the CMS plan for full compliance evaluations:**

   - **Conduct full compliance evaluations of Part 70 sources once every two years, except mega-sites, gas compressor stations and gas turbines facilities.**

- **Mega-sites will be identified in the CMS plan and a full compliance evaluation of those sites will be conducted once every three years.**
- **Gas compressor stations and gas turbines facilities will be identified in the CMS plan and full compliance evaluations of those sites will be conducted once every five years.**
- **Conduct full compliance evaluations of all FESOP sources once every five years except, as noted in the CMS.**
- **In those years where full compliance evaluations are not conducted, partial compliance evaluations will be completed including review of annual compliance certifications, review of quarterly deviation reports, review of emergency reports and review of the various emissions reports.**

STATUS: Ongoing.

The Air Compliance and Enforcement Branch conducted 299 full compliance evaluations at Part 70 sources and 136 full compliance evaluations at FESOP sources for FY12 and 284 full compliance evaluations at Part 70 sources and 124 full compliance evaluations at FESOP sources for FY13. The Air Compliance and Enforcement Branch continue to conduct full compliance evaluations on Part 70 and FESOP sources beyond the CMS. These full compliance evaluations are reported into the AFS database on a monthly basis. Mega sites and gas compressor station full compliance evaluations are conducted as part of Part 70 and FESOP sources noted above.

The Air Compliance and Enforcement Branch and Regional Offices reviewed 584 or 97% of the 2011 Part 70 annual compliance certifications (ACCs) and 485 or 97% of the 2011 FESOP ACCs submitted in 2012. The Air Compliance and Enforcement Branch and Regional Offices have currently reviewed 437 or 79% of the 2012 Part 70 ACCs and 395 or 83% of the 2012 FESOP ACCs submitted in 2013. Note that ACCs are submitted and reviewed on a calendar year basis so there will always be a lag reporting completed ACC reviews for the EnPPA. The branch continues to receive and review Part 70 and FESOP ACCs received in calendar year 2013.

The branch continues to conduct partial compliance evaluations including review of stack tests, continuous opacity and emissions data, quarterly deviation reports, review of emergency reports, and review of the various emissions reports.

CHALLENGES: It is difficult to track and report ACCs on a federal fiscal year since the ACCs are due, submitted, and reviewed on a calendar year basis. ACCs are reported into AFS consistent with Minimum Data Requirements (MDR) as they are received and reviewed. The federal fiscal year overlaps two ACC reporting periods, which causes EnPPA reporting to reflect ACCs from two different reporting periods including ACCs currently pending review. The reviews are completed on a calendar year basis consistent with the ACC reporting period and reported to AFS consistent with the MDR. IDEM and U.S. EPA R5 continue to track progress of the ACCs receipt and review during the monthly calls.

d) **Submit compliance and enforcement information to meet U.S. EPA's Minimum Data Requirements (MDRs) within the 60 day standard required for reporting by the 2005 and 2008 Air Facility System (AFS) Information Collection Request (ICR), 1998 Timely**

and Appropriate Enforcement Response to High Priority Violations (HPVs) policy, and the 1986 Guidance on Federal Reportable Violations (FRVs) for stationary sources. Ensure data is complete, accurate, and timely; consistent with U.S. EPA policies and ICR.

STATUS: Ongoing.

The Air Compliance and Enforcement Branch continues to upload data from the Air Compliance and Enforcement System (ACES) to AFS on a monthly basis exceeding the 60 day standard. The branch also directly inputs HPVs (and non-HPV cases of regulated facilities) into AFS as HPVs/enforcement and are identified or updated. The Air Compliance and Enforcement Branch continues to work with U.S. EPA to ensure the data is complete, accurate, and timely. Issues are discussed during the monthly U.S. EPA/IDEM Compliance and Enforcement and Data Management conference calls and through HPV and Watch List emails and calls. The Air Compliance and Enforcement Branch's Enforcement Data Steward reviews all current and recently closed enforcement cases on a monthly basis. Updates are made to IDEM's enforcement database (METS). AFS is manually updated monthly with all required MDR entries based on data from METS.

CHALLENGES: Data entry for some construction and/or operation without a permit and/or emission violations based stack tests can be an issue. The Air Compliance and Enforcement Branch has improved the timeliness of identifying construction and/or operation without permit violations. In some instances, a violation cannot be determined until a complete permit application is received and reviewed. A Day Zero based on the date the source was actually constructed and operated without a permit may conflict with the date the violation was actually determined by the agency. Emission violations based on stack tests may be delayed due to the amount of time sources have to submit the test results and the time it takes to review the test report necessary to confirm a violation. Again, a Day Zero based on the date of the test conflicts with the date the violation was actually determined by the agency. The Day Zero in the HPV Policy is calculated from the date the violation is discovered by the agency and not the date the violation actually occurred. IDEM and U.S. EPA continue to address the issue of the Zero Date of these types of violations for AFS reporting purposes. IDEM and U.S. EPA continue to track progress of the enforcement actions during the monthly calls.

e) **Respond to complaints including those referred from U.S. EPA. Inspections will be conducted where necessary.**

STATUS: Ongoing.

The Air Compliance and Enforcement Branch responded to 642 complaints in FY12 and 652 complaints in FY13. The branch and regional offices continue to respond to all complaints including those referred from U.S. EPA.

CHALLENGES: No challenges encountered.

f) **U.S. EPA will provide compliance and enforcement support and guidance and make training available to IDEM staff as needed.**

STATUS: Ongoing.

CHALLENGES: No challenges encountered.

g) **Prepare enforcement cases according to IDEM's Compliance and Enforcement Response Nonrule Policy (CERP) and guidance, and U.S. EPA's Timely and Appropriate Enforcement Response to High Priority Violations Policy. IDEM will review findings and prepare enforcement cases according to the HPV Policy, IDEM CERP and guidance, and the IDEM Civil Penalty Nonrule Policy for noncompliance with statutes, rules or permits.**

STATUS: Ongoing.

The Air Compliance and Enforcement Branch continues to review and follow IDEM's guidance and U.S. EPA's Timely and Appropriate Enforcement Response to High Priority Violations (HPV) Policy to prepare enforcement cases and follow-up as appropriate. Violations are referred for enforcement consistent with the CERP and HPV Policy. A total of 53 Notice of Violations were signed during FY12 and a total of 58 Agreed Orders were adopted during the same period. A total of 84 Notice of Violations were signed for FY13 and a total of 79 Agreed Orders were adopted during the same period. The branch continues to review findings and prepares enforcement cases according to the HPV Policy and the Civil Penalty Policy.

CHALLENGES: No challenges encountered.

h) **Participate in enforcement/settlement negotiation conferences and follow-up on the requirements of IDEM's agreed and/or Commissioner's Orders.**

STATUS: Ongoing.

Compliance and enforcement managers in the branch continue to conduct pre-Notice of Violation meetings, settlement conferences, and follow-up on Agreed Orders. A total of 21 pre-Notice of Violation meetings and a total of 22 settlement conferences were held for FY12. A total of 27 pre-Notice of Violation meetings and a total of 33 settlement conferences were held for FY13.

CHALLENGES: No challenges encountered.

i) **U.S. EPA and IDEM will conduct monthly conference calls to discuss planning, program progress, compliance and enforcement issues, HPV, data management and reporting, and efforts to resolve violations. For state lead HPV cases unaddressed over the 270 day timeframe, U.S. EPA and IDEM will determine which agency is best suited to take or maintain the lead for the case and what will be the best method of returning the source back into compliance. Any data issues will also be discussed on these monthly conference calls.**

STATUS: Ongoing.

The Air Compliance and Enforcement Branch and U.S. EPA hold monthly U.S. EPA/IDEM Compliance and Enforcement and Data Management conference calls. Priorities, compliance and enforcement issues, complaints, HPVs, Watch List cases, data management and reporting issues are discussed. Both IDEM and U.S. EPA participated in a May 3, 2012 and April 10, 2013 planning meeting/webinar.

CHALLENGES: No challenges encountered.

j) **IDEM will track and update U.S. EPA quarterly on the recommendations made from the Round 3 State Review Framework until completion.**

STATUS: The Round 3 State Review Framework was completed on May 17, 2013 by U.S. EPA R5. IDEM and U.S. EPA R5 continue to discuss and track progress of the findings and recommendations during the monthly calls.

CHALLENGES: No challenges encountered.

k) **IDEM will provide to U.S. EPA quarterly updates of the status code and explanation for HPV sources listed on U.S. EPA Headquarters Watch List as a state lead. The Watch List ensures timely and appropriate response to significant noncompliers or longstanding violators through better data analysis and routine discussions between U.S. EPA Headquarters, OECA, U.S. EPA R5, and/or IDEM.**

STATUS: Ongoing.

The U.S. EPA R5 Data Steward sends a copy of the quarterly Watch List when issued. The Compliance and Enforcement Branch reviews the state lead cases and submits status codes and descriptions to the U.S. EPA R5 Data Steward within 14 days. IDEM and U.S. EPA monitor the cases on the Watch List through U.S. EPA's IN HPVs Unaddressed 270 Days or More report. The Air Compliance and Enforcement Branch and U.S. EPA discuss the sources on the list during each monthly U.S. EPA/IDEM Compliance and Enforcement and Data Management conference call.

CHALLENGES: No challenges encountered.

Compliance Monitoring Strategy (CMS) for Asbestos		**A-5**
Contact(s): Phil Perry & Dan Stamatkin	U.S. EPA Contact(s): Brent Marable, Debra Flowers, and Rochelle Marceillars	Due Date: September 30, 2013
U.S. EPA Role: Review delegation authority to implement and enforce the 40 CFR, Part 61, National Emission Standards for Asbestos. Work closely with OAQ staff to ensure any issues are raised and satisfactorily addressed.		
Goal 5: Enforcing environmental laws. **Objective 5.1: Enforce environmental laws.** **Funding: Federal**		

Implement a compliance and enforcement program for asbestos inspections and compliance evaluation of asbestos notifications, licensed asbestos contractors, and stationary asbestos sources.

a) **Submit annual reports to U.S. EPA on asbestos demolition/renovation notifications submitted by the owner/operator, compliance evaluations conducted, and enforcement actions initiated by IDEM. The report will be submitted alphabetically by owner/operator and includes the numbers of asbestos demolition/renovation notifications received, warning letters, NOVs, referrals, Agreed Orders, state court orders/decrees, and penalties assessed.**

STATUS: Ongoing.

OAQ's Compliance and Enforcement Branch and Operations Branch continue to implement the asbestos compliance and enforcement program and the asbestos licensing program. The Compliance and Enforcement Branch continues to review asbestos demolition/renovation notifications, conduct inspections, respond to asbestos related

complaints, and take appropriate enforcement actions to address noncompliance. The Operations Branch continues to review training course providers, asbestos training, and asbestos license applications. The Operations Branch in coordination with the Indiana Professional Licensing Agency (PLA) created the Indiana Online Licensing system so that individuals and contractors can obtain their licenses online. IDEM continues to work with PLA as the software platforms have been updated and changed. The Asbestos Annual Report for FY12 was submitted to U.S. EPA R5 on October 31, 2012 and the FY13 report was submitted to U.S. EPA R5 on October 25, 2013.

CHALLENGES: No challenges encountered.

Air Monitoring Branch

Conduct Ambient Air Quality Monitoring Throughout Indiana		**A-6**
Contact(s): Richard Zeiler & Steve Lengerich	U.S. EPA Contact(s): Loretta Lehrman	Due Date: Ongoing.
U.S. EPA Role: Regulatory advice, funding and review.		
Goal 1: Taking action on climate change and improving air quality. **Objective 1.2: Improve air quality.** **Funding: Federal**		

a) **Operate monitors for National Ambient Air Quality Standards (NAAQS) pollutants and Photochemical Assessment Monitoring Stations (PAMS) according to 40 CFR 58, approved monitoring plans and the quality management plan/quality assurance project plans (QMP/QAPPS).**

STATUS: Ongoing.

IDEM will continue to operate the air quality monitoring networks approved by U.S. EPA listed in the Indiana 2014 Ambient Air Monitoring Network Plan.

CHALLENGES: No challenges encountered.

b) **Submit annual network plan required by 40 CFR 58.10 by July 1 of the prior year, unless another schedule has been approved by U.S. EPA R5.**

STATUS: Complete.

IDEM completed the annual Indiana 2014 Ambient Air Monitoring Network Plan and the plan was available for the required 30-day public review period. Comments were received and the responses were added to the plan. The plan was submitted electronically to U.S. EPA on June 21, 2013.

CHALLENGES: No challenges encountered.

c) **Improve certification lab operation by the continued use of the most current lab standards, and continued use of state-of-the-art techniques to produce the most accurate certifications possible.**

STATUS: Ongoing.

Lab standards are replaced on or before the ending certificate date. The IDEM QA Certification Lab is a state-of-the-art facility utilized by U.S. EPA to host various Air Pollution Training Institute (APTI) technical monitoring training courses.

CHALLENGES: No challenges encountered.

d) Investigate new analytical methods of testing through new equipment.

STATUS: Ongoing.

The lab is constantly researching new instruments and methods available.

CHALLENGES: No challenges encountered.

e) Ensure adequate, independent QA audits of NAAQS monitors.

STATUS: Ongoing.

Independent audits are conducted on NAAQS gaseous monitors every two weeks and particulate samplers are conducted quarterly.

CHALLENGES: No challenges encountered.

f) Conduct speciation monitoring for $PM_{2.5}$ and submit data to the Air Quality System (AQS).

STATUS: Ongoing.

Indiana operates seven $PM_{2.5}$ speciation monitoring sites at various locations throughout the state dating back to December 2000. To augment this data, IDEM also operates continuous black carbon monitors at four of the sites and continuous sulfate monitors at two of these locations. Additionally, IDEM is conducting a carbon screening special study at four additional locations during FY13 at sites in Clarksville, Lawrenceburg, NE Indiana, and NW Indiana to assess these areas for possible future permanent speciation sites.

CHALLENGES: No challenges encountered.

g) Conduct aethalometer monitoring.

STATUS: Ongoing.

IDEM is currently operating four continuous aethalometer monitoring sites in Indiana. Monitors are located in Evansville, Indianapolis, Gary, and Elkhart. Additionally, IDEM is proposing to conduct a carbon screening special study at four additional locations during FY13 at sites in Clarksville, Lawrenceburg, NE Indiana, and NW Indiana to assess these areas for possible future permanent speciation sites.

CHALLENGES: No challenges encountered.

h) Operate, evaluate and improve monitoring procedures and data reporting of the PAMS monitoring in Northwest Indiana.

STATUS: Ongoing.

IDEM continues to operate the Gary IITRI PAMS Type-2 site as well as the Indianapolis Washington Park PAMS site. The Washington Park site was established in FY12 to better understand the chemistry involved in ozone formation for the Indianapolis area.

CHALLENGES: The future and the utility of the PAMS data and the overall program are being assessed at the national level. Instruments used for these two monitoring sites are aging and maintenance/repair costs are elevated. If the PAMS monitoring program is to continue into the future, new instrument purchases will need to be addressed in the upcoming budget years.

i) Continue to use the Interagency Monitoring of Protected Visual Environmental

(IMPROVE)-style carbon samplers at $PM_{2.5}$ speciation trends and supplemental sites.

STATUS: Ongoing.

All seven speciation sites in Indiana have been converted to the URG, IMPROVE-style carbon sampler.

CHALLENGES: No challenges encountered with the conversion to the URG samplers or with the operation of these units.

j) Continue to operate the source and population-oriented monitors for the revised Lead (Pb) Standard.

STATUS: Complete.

IDEM established four new sites for large lead-emitting sources and acquired approved waivers from U.S. EPA addressing the other two sources. The sites were operational by January 1, 2010. The population based required monitors were also operational well before the January 1, 2011, deadline. The sampling frequency was increased to every three days at the Muncie (Exide) lead site effective April 1, 2012.

CHALLENGES: No problems were encountered regarding these site setups. The East Chicago Water Treatment site has been relocated to the East Chicago Marina.

k) Continue to operate NCore site in Indianapolis.

STATUS: Ongoing.

All 12 required NCore parameters were established at the Indianapolis Washington Park site by July 2011. Additionally, 13 auxiliary parameters are also monitored at this location to augment the NCore data analysis.

CHALLENGES: No challenges encountered.

l) Site new NAAQS stations as required for SO_2 source-oriented monitoring.

STATUS: IDEM currently submits quality assured SO_2 data from 13 sites representing 12 facilities to the AQS data repository. IDEM has reviewed past data and applied screening models to determine that four areas of the state will probably not meet the 75 ppb hourly NAAQS. A recent U.S. EPA "white paper" has solicited comments and discussion regarding the new standard prior to final implementation of a monitoring plan to address the SO_2 source-oriented monitoring requirements. IDEM is awaiting final guidance from U.S. EPA before drafting a monitoring plan to address the high SO_2 emission sources.

CHALLENGES: Depending on the number of sources and the number of required monitors per source, the equipment costs and staff resources required to implement this monitoring program could be vast.

m) Site new NAAQS stations as required for near-roadway NO_2 and CO monitoring to be operational by January 1, 2013.

STATUS: Ongoing.

IDEM has finalized a site location for the Indianapolis area near-roadway NO_2/CO monitoring requirement. A monitoring plan for the Roadway NO_2/CO site and an agreement with IDEM and the Indiana Department of Transportation (INDOT) was drafted. This plan was submitted to U.S. EPA R5 and approved. The rollout of this project was extended by U.S. EPA R5, thus delaying the time line for plan submittal and implementation.

CHALLENGES: Supplemental Section 103 funding for this project for $200,000 was delayed by U.S. EPA during FY12 and was received in March 2013. All equipment necessary for this site has been procured and the site installation is on track to meet the January 1, 2014 time line.

Monitor for Air Toxics		**A-7**
Contact(s): Steve Lengerich, Richard Zeiler & Brian Wolff	U.S. EPA Contact(s): Loretta Lehrman, Motria Caudill & Carl Nash	Due Date: Ongoing.
U.S. EPA Role: Risk assessment and data analysis advice, special grant funding and review. Collaborate with IDEM as appropriate to evaluate and mitigate localized air toxics.		
Goal 1: Taking action on climate change and improving air quality. **Objective 1.2: Improve air quality.** **Funding: Federal**		

Conduct effective non-criteria pollutant monitoring.

a) **Maintain Indiana Air Toxic Monitoring Program.**

STATUS: Ongoing.

IDEM will continue the Urban Air Toxic Monitoring Program at nine locations throughout the state. The Lafayette monitoring site has been relocated to Terre Haute effective November 2013.

CHALLENGES: No challenges encountered.

b) **Conduct toxics monitoring at Whiting High School in Whiting.**

STATUS: Ongoing.

IDEM will continue air toxics monitoring at the Whiting High School site in Whiting, Indiana as a part of IDEM's Urban Air Toxic monitoring network.

CHALLENGES: No challenges encountered.

c) **Conduct RadNet monitoring in Indianapolis.**

STATUS: Ongoing.

IDEM will continue to operate the Indianapolis RadNet site.

CHALLENGES: No challenges encountered.

d) **IDEM and U.S. EPA will continue to collaborate in the evaluation of localized air toxics data as warranted. Assessments shall include a determination of visible pollution prevention measures to assist in mitigation as appropriate.**

STATUS: Ongoing.

IDEM's data is analyzed internally by the Air Program Branch staff of the Office of Air Quality to generate a screening report on all nine Urban Air Toxic Monitoring sites on a monthly basis. The report outlines the outlier values and compares the observed concentration to short and long term population exposure levels. So far, the monitored levels are low so no mitigation plan has been required.

CHALLENGES: No challenges encountered.

Make Air Monitoring Information Publicly Available		A-8
Contact(s): Steve Lengerich	U.S. EPA Contact(s): Loretta Lehrman & Pat Schraufnagel	Due Date: Ongoing.
U.S. EPA Role: Advice, funding and review.		
Goal 1: Taking action on climate change and improving air quality. **Objective 1.2: Improve air quality.** **Funding: Federal**		

Assess and modify Indiana's air monitoring program and make monitoring information available to the public.

a) **Perform a quality assurance (QA) network evaluation.**

STATUS: Ongoing.

All networks are evaluated on an annual basis.

CHALLENGES: No challenges encountered.

b) **Conduct data analysis to determine improvement, degradation, etc. of air quality.**

STATUS: Ongoing.

Assessments are ongoing by various programs in IDEM.

CHALLENGES: No challenges encountered.

c) **Perform annual industry evaluations (systems audit).**

STATUS: Ongoing.

Audits are performed annually on industrial network systems. A thorough evaluation of the SO_2 emission source networks has revealed a high confidence level in the ambient air quality data generated by these consulting groups operating the monitors.

CHALLENGES: No challenges encountered.

d) **Annually review and update OAQ Quality Assurance Manual.**

STATUS: Ongoing.

The entire manual is currently being reviewed and updated with a completion date of December 31, 2013.

CHALLENGES: No challenges encountered.

e) **Submit National Ambient Air Quality Standards (NAAQS) pollutant data, Photo-chemical Analytical Monitoring Stations (PAMS) and QA data to Air Quality Standard (AQS) according to schedule in 40 CFR 58.**

STATUS: Complete.

All ambient air quality data was submitted to the AQS in compliance within established time frames.

CHALLENGES: No challenges encountered.

f) **Produce daily and hourly ozone and $PM_{2.5}$ data and maps to be posted on the Internet as per U.S. EPA Ozone and $PM_{2.5}$ Mapping Projects.**

STATUS: Ongoing.

IDEM submits hourly ozone and fine particulate data to AIRNOW for the national mapping and forecasting program.

CHALLENGES: This project is performed electronically on an hourly basis without any challenges encountered.

g) Maintain air quality index (AQI) reporting in designated cities.

STATUS: Ongoing.

Hourly updates for AQI are provided through the LEADS® Internet based air quality display system.

CHALLENGES: The AQI is provided through an automated electronic process without any challenges encountered.

h) Certify NAAQS pollutant data in AQS and provide supporting documentation by the schedule in 40 CFR 58.

STATUS: Ongoing.

All air quality data submitted to AQS are certified in accordance with U.S. EPA established time frames.

CHALLENGES: No challenges encountered.

i) Ozone, $PM_{2.5}$ and meteorological data should be submitted to AIRNOW.

STATUS: Ongoing.

Ozone, fine particulate and meteorological hourly data are supplied to AIRNOW.

CHALLENGES: No challenges encountered with this automated process.

Leading Environmental Analysis and Display System (LEADS®)		**A-9**
Contact(s): Steve Lengerich	U.S. EPA Contact(s): Loretta Lehrman	Due Date: Ongoing.
U.S. EPA Role: To advise, funding and review.		
Goal 1: Taking action on climate change and improving air quality. **Objective 1.2: Improve air quality.** **Funding: Federal**		

Collect real-time air quality information using LEADS®.

a) Maintain automatic calibration equipment at all continuous monitoring sites.

STATUS: Complete.

All existing IDEM continuous air quality monitoring sites have been converted to the LEADS® system, in conjunction with automated audit and calibration capabilities. A recent update to the LEADS® system will provide for more enhanced data graphics, updated data validation procedures, and full page viewing of data; and, additional non-continuous data will be posted to the agency website.

CHALLENGES: A slow contract review and approval process (over 90 days) has frustrated staff, but these obstacles will be overcome and the new contract implemented in the near future.

b) Deploy LEADS® at all newly established continuous monitoring site locations.

STATUS: Ongoing.

Sixty-three active sites have been deployed with five additional sites to be added by the end of calendar year 2013 as planned in the annual network review.

CHALLENGES: Securing new site land use agreements have proven to be challenging due to landowners backing out of proposed agreements, but IDEM is currently on-track to implement all new continuous sites by the end of calendar year 2013.

c) Provide current data from all active continuous monitoring sites to the public via the agency website.

STATUS: Complete.

All active continuous air quality monitoring sites are reporting data to the agency website.

CHALLENGES: No challenges encountered.

d) Provide past data from active continuous monitoring sites and past data from recently discontinued sites.

STATUS: Complete.

All active continuous air quality monitoring sites have been archived with the last 10 years of air quality data. Additionally, 45 more LEADS® system licenses will be used to post intermittent FRM particulate data and industrial SO_2 data to the agency website. IDEM also anticipates being able to post air toxics data for 62 compounds from 10 site locations to the agency website by the end of calendar year 2013.

CHALLENGES: A slight delay in getting the toxic data posted to the website was the result of needing to wait until the new contract was implemented then amended with a "task order" to complete this project.

Persistent Bioaccumulative Toxics Great Lakes Air Deposition		**A-10**
Contact(s): Brian Wolff	U.S. EPA Contact(s): Erin Newman	Due Date: Ongoing.
U.S. EPA: Timely guidance, review and approval.		
Goal 1: Taking action on climate change and improving air quality. **Objective 1.2: Improve air quality.** **Funding: Federal**		

IDEM will undertake several activities to evaluate persistent bioaccumulative toxics (PBTs):

a) IDEM will support emissions inventory work regarding PBTs.

STATUS: Complete.

IDEM collected air toxic emissions data including information on PBTs. IDEM sent specific emission inventory requests to some industry on a case by case basis to fill in gaps in the inventory.

CHALLENGES: No challenges encountered.

b) IDEM will use staff time to identify and quantify source types and emissions that contribute PBTs to lakes through atmospheric deposition.

STATUS: Complete.

IDEM worked with the Great Lakes Regional Collaboration (GLRC) and other states to identify source types and emissions that contribute to mercury deposition in the Great Lakes. IDEM helped compile a report detailing this information.

CHALLENGES: No challenges encountered.

c) IDEM will analyze and interpret historic PBT monitoring information in Indiana.

STATUS: Complete.

CHALLENGES: No challenges encountered.

d) U.S. EPA will provide timely guidance, review and approval.

STATUS: Complete.

U.S. EPA provided guidance and direction when contacted by IDEM concerning specific questions or issues.

CHALLENGES: No challenges encountered.

Air Programs Branch

Ozone and $PM_{2.5}$ Re-designation Petitions and Maintenance Plans		**A-11**
Contact(s): Scott Deloney	U.S. EPA Contact(s): John Mooney	Due Date: Ongoing.
U.S. EPA: Timely guidance, review and approval.		
Goal 1: Taking action on climate change and improving air quality. **Objective 1.2: Improve air quality.** **Funding: Federal**		

Perform and submit re-designation petitions and maintenance plans as applicable.

a) Public comment period to commence within eight months of quality assurance/quality control (QA/QC) of monitoring data.

STATUS: Complete.

CHALLENGES: No challenges encountered.

b) Final submittal to U.S. EPA to be made within 10 months of QA/QC of monitoring data.

STATUS: Complete.

CHALLENGES: No challenges encountered.

c) U.S. EPA will provide timely guidance, review and approval.

STATUS: Ongoing.

U.S. EPA has not finalized one area for $PM_{2.5}$.

CHALLENGES: No challenges encountered.

Preliminary Designation Recommendations for SO_2		**A-12**
Contact(s): Scott Deloney	U.S. EPA Contact(s):John Mooney	Due Date: See below.
U.S. EPA Role: Timely guidance, review and approval.		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: Federal

Conduct analysis, develop and submit designation recommendations to U.S. EPA concerning SO_2 standard.

a) **Provide initial recommendations by June 2011.**

May 2011 ready for senior management review.

STATUS: Complete.

Original recommendations supplemented with 2011 data in April 2012, along with revised boundary recommendations.

CHALLENGES: No challenges encountered.

Rule and State Implementation Plan Preparation – for SO_2		**A-13**
Contact(s): Scott Deloney	U.S. EPA Contact(s):John Mooney	Due Date: See below.
U.S. EPA Role: Timely guidance, review and approval.		

Goal 1: Taking action on climate change and improving air quality.
Objective 1.2: Improve air quality.
Funding: Federal

Conduct modeling analysis, establish emission limitations and monitoring requirements to support approval attainment and maintenance SIPs.

a) **First notice for rulemaking May 2011.**

STATUS: Complete.

CHALLENGES: No challenges encountered.

b) **Modeling complete August 2011.**

STATUS: Ongoing.

Modeling analysis was completed on time. However, all follow-up work has been suspended until a federal implementation program is in place.

CHALLENGES: No challenges encountered.

c) **Second notice of rulemaking November 2011.**

STATUS: Suspended.

All work associated with the SO_2 standard has been suspended until a federal implementation program is in place.

CHALLENGES: No challenges encountered.

d) **SIPs submitted June 2013.**

STATUS: Suspended.

All work associated with the SO_2 standard has been suspended until a federal implementation program is in place.

CHALLENGES: No challenges encountered.

e) U.S. EPA will provide timely guidance, review and approval.

STATUS: Suspended.

IDEM lacks sufficient guidance to proceed.

CHALLENGES: No challenges encountered.

Article 2 Revisions		**A-14**
Contact(s): Scott Deloney	U.S. EPA Contact(s): Pamela Blakley	Due Date: See below.
U.S. EPA Role: Timely guidance, review and approval.		
Goal 1: Taking action on climate change and improving air quality. **Objective 1.2: Improve air quality.** **Funding: Federal**		

a) IDEM requested U.S. EPA R5 involvement in the Article 2 rulemaking activities. This includes the Article 2 initiative short-term and long term rules, the permitting fee rulemaking, a rulemaking that pertains to SSOAs and permits by rule, and any other Article 2 rulemaking to obtain U.S. EPA approval of Indiana's permitting program.

STATUS: Ongoing.

Rulemaking postponed due to feasibility of proceeding with desired revisions and resource constraints.

CHALLENGES: No challenges encountered.

b) IDEM will ensure early coordination and consultation with U.S. EPA R5.

STATUS: Ongoing.

Rulemaking postponed due to feasibility of proceeding with desired revisions and resource constraints.

CHALLENGES: No challenges encountered.

c) U.S. EPA will provide timely guidance, review and approval.

STATUS: Ongoing.

Rulemaking postponed due to feasibility of proceeding with desired revisions and resource constraints.

CHALLENGES: No challenges encountered.

Lead Designations and Implementation Plans		**A-15**
Contact(s): Scott Deloney	U.S. EPA Contact(s): John Mooney	Due Date: See below.
U.S. EPA Role: Timely guidance, review and approval.		
Goal 1: Taking action on climate change and improving air quality. **Objective 1.2: Improve air quality.** **Funding: Federal**		

Conduct analysis, develop, and submit designation recommendations to U.S. EPA concerning the 2008 lead NAAQS.

a) Provide U.S. EPA with attainment demonstration for Muncie area by June 2012.

STATUS: Complete.

Rulemaking to establish regulatory requirements is underway. The comprehensive draft SIP was completed and provided to U.S. EPA, and the final SIP is pending promulgation of rulemaking.

Rulemaking and SIP development complete. Final submittal made to U.S. EPA R5 in January 2013. Control requirements became effective October 1, 2013.

CHALLENGES: No challenges encountered.

Ozone Designations		**A-16**
Contact(s): Scott Deloney	U.S. EPA Contact(s): John Mooney	Due Date: See below.
U.S. EPA Role: Timely guidance, review and approval.		
Goal 1: Taking action on climate change and improving air quality. **Objective 1.2: Improve air quality.** **Funding: Federal**		

Conduct analysis, develop, and submit designation recommendations to U.S. EPA concerning the 2011 ozone NAAQS.

a) Provide initial ozone designation recommendations by March 2012 (assuming standard is issued in July 2011).

STATUS: Complete.

This project was superseded with implementation of the 2008 standard. Those recommendations were provided in 2009. This process is now complete.

CHALLENGES: No challenges encountered.

Greenhouse Gas (GHG) Tailoring Rule for Prevention of Significant Deterioration (PSD) and Title V		**A-17**
Contact(s): Chris Pedersen	U.S. EPA Contact(s):John Mooney	Due Date: To be established.
U.S. EPA Role: Timely guidance, review and approval.		
Goal 1: Taking action on climate change and improving air quality. **Objective 1.2: Improve air quality.** **Funding: Federal/State Fees (Title V Ineligible)**		

a) IDEM will submit final rules for approval by U.S. EPA.

STATUS: Pending release of guidance.

The final rules are complete. The PSD rule was submitted to U.S. EPA on July 7, 2011. The final rule for the Title V portion is complete, but not submitted pending release of guidance from U.S. EPA.

CHALLENGES: U.S. EPA plans to release guidance on streamlined Title V program approvals for submittal of GHG Tailoring Rule provisions from states. To date, U.S. EPA has not released this guidance. IDEM cannot submit the state Title V GHG Tailoring Rule for program approval until the guidance is provided.

b) Approval of PSD GHG Tailoring Rule provision into the SIP.

STATUS: Complete.

U.S. EPA approved Indiana's PSD GHG Tailoring Rule into the SIP and it was published in the Federal Register on September 28, 2011 (76 FR 59899).

CHALLENGES: No challenges encountered.

c) Approval of Title V program revisions to address the GHG Tailoring Rule.

STATUS: Ongoing.

IDEM is holding the Title V GHG Tailoring Rule pending release of guidance from U.S. EPA on the streamline approach to submitting these rule changes for program approval.

CHALLENGES: No challenges encountered.

$PM_{2.5}$ PSD/New Source Review (NSR) Rules		**A-18**
Contact(s): Chris Pedersen	U.S. EPA Contact(s):John Mooney	Due Date: To be established.
U.S. EPA Role: No role identified.		
Goal 1: Taking action on climate change and improving air quality. **Objective 1.2: Improve air quality.** **Funding: Federal**		

a) IDEM will adopt PSD/NSR rule revisions to implement $PM_{2.5}$ and submit those rules for approval by U.S. EPA, upon receipt of necessary guidance from U.S. EPA.

STATUS: Complete.

The $PM_{2.5}$ NSR rulemaking is complete and was filed on June 11, 2012, and became effective on July 11, 2012. The $PM_{2.5}$ NSR package was submitted on July 12, 2012.

CHALLENGES: No challenges encountered.

b) Approval of PSD/NSR $PM_{2.5}$ provisions into the SIP.

STATUS: Complete.

The package was submitted to U.S. EPA on July 12, 2012. U.S. EPA published the proposed approval on November 1, 2013 with a comment period ending on December 2, 2013.

CHALLENGES: No challenges encountered.

Environmental Justice		**A-19**
Contact(s): Brian Wolff	U.S. EPA Contact(s): Carlton Nash	Due Date: June 2012
U.S. EPA Role: Provide guidance to IDEM upon request.		
Goal 1: Taking action on climate change and improving air quality. **Objective 1.2: Improve air quality.** **Funding: Federal**		

IDEM will perform a detailed evaluation of the "high risk facilities" identified by the 2005 National Air Toxics Assessment (NATA). The evaluation of facilities will be prioritized based on level of potential risk and environmental justice-related statistics. Action steps of this project include:

a) **IDEM will evaluate and verify emission-related information and inputs used in the 2005 NATA for each high risk facility identified. IDEM will then use the most current information available to identify the level of risk that is most representative for each facility. IDEM will use U.S. EPA's "high risk" threshold to determine whether further evaluation is warranted.**

STATUS: Complete.

IDEM has evaluated the high risk facility list as provided by U.S. EPA. IDEM ran a risk screening assessment on the facilities and identified facilities that require more attention either due to high risk estimates or lack of emission inventory information. IDEM worked with the industries identified to gather more information and then remodeled the facilities with more accurate information.

CHALLENGES: Getting industry to respond initially to the information requests proved to be a challenge.

b) **IDEM will prioritize the remaining facilities based on a scale weighted by a combination of environmental justice factors and the potential risk posed by the applicable facility.**

STATUS: Complete.

IDEM has taken into account the population that surrounds the facilities that were identified.

CHALLENGES: Finding up to date information pertaining to possible environmental justice risk factors has been a challenge.

c) **IDEM will perform local scale air dispersion modeling and air toxics screening analyses to evaluate in greater detail the potential risk posed by each facility. The results from this task will be reprioritized based on the weighted scale used in step b) above.**

STATUS: Complete.

Enhanced modeling has been performed and details were shared with U.S. EPA R5 staff.

CHALLENGES: Getting accurate emissions information was a challenge.

d) **IDEM will assess the compliance status of each source based on the identified level of priority. Also based on the prioritized results, IDEM will explore potential pollution prevention and risk reduction opportunities.**

STATUS: Complete.

IDEM submitted the list of high risk facilities to the Compliance Branch for review following the completion of the modeling. Sources identified as high risk were evaluated by compliance staff.

CHALLENGES: No challenges encountered.

e) **IDEM will prepare a report outlining the results of the project, which shall include**

observations and conclusions regarding environmental justice implications associated with the risk of air toxics exposure, the accuracy of the 2005 NATA for sources evaluated as part of this project, and the benefits associated with risk reduction initiatives (if applicable.)

STATUS: Complete.

A completed report was submitted to U.S. EPA R5 at the conclusion of the evaluation.

CHALLENGES: No challenges encountered.

Air Toxics in Schools Initiative		**A-20**
Contact(s): Brian Wolff	U.S. EPA Contact(s): Motria Caudill	Due Date: To be established.
U.S. EPA Role: No role identified.		
Goal 1: Taking action on climate change and improving air quality. **Objective 1.2: Improve air quality.** **Funding: Federal**		

a) **U.S. EPA and IDEM will evaluate historic particulate filters for metal concentrations (primarily manganese and lead). This evaluation will support a trend analysis and site comparison of key compounds associated with the School Air Toxics Initiative.**

STATUS: Ongoing.

IDEM and U.S. EPA decided which locations' historic samples should be evaluated and IDEM is in the process of retrieving the historic filters for analysis by U.S. EPA's contract lab.

CHALLENGES: No challenges encountered.

b) **IDEM will provide assistance to U.S. EPA as needed regarding the review, interpretation, and communication of risk and air toxics monitoring results for Indiana schools included in the U.S. EPA Schools Air Toxics Initiative.**

STATUS: Complete.

IDEM reviewed the report and data from U.S. EPA R5 and provided comments to U.S. EPA R5 staff.

CHALLENGES: No challenges encountered.

Land Quality

Resource Conservation Recovery Act (RCRA) Corrective Action		L-1
Contact(s): Vic Windle & Mike Sickels	U.S. EPA Contact(s): Peter Ramanauskas and Daniel Chachakis	Due Date: See below
U.S. EPA Role: Contractor support for sampling and risk review at selected sites.		
Goal 3: Cleaning up communities and advancing sustainable development. **Objective 3.2: Preserve land.** **Funding: Federal**		

Meet the requirements of the Resource Conservation and Recovery Act (RCRA) Government Performance and Results Act (GPRA).

a) **IDEM will work with U.S. EPA to establish reasonable deadlines for specific facilities. IDEM will issue permits, orders and voluntary agreements that will help achieve U.S. EPA's 2020 GPRA goals.**

STATUS: Ongoing.

Deadlines completed and other activities are ongoing.

CHALLENGES: No challenges encountered.

b) **For the 2020 Corrective Action Universe facilities IDEM will achieve the following GPRA correction action goals:**

- **By September 30, 2011: 41% for CA550, 74% of the CA725, and 66% for the CA750.**

STATUS: Complete.

All goals exceeded: CA550=63.6%, CA725=93.9% and CA750=86.4%.

CHALLENGES: No challenges encountered.

- **By September 30, 2012: 45% for CA550, 76% of the CA725, and 69% for the CA750.**

STATUS: Complete.

IDEM accepted the lead from U.S. EPA for three new facilities, thereby increasing IDEM's 2020 GPRA baseline to 69 facilities. This accounts for the slight decrease in percentages completed for Environmental Indicators CA725 and CA750 when compared to the September 30, 2011 numbers.

All goals exceeded: CA550=64.7%, CA725=85.3% and CA750=77.9%.

CHALLENGES: No challenges encountered.

- **By June 30, 2013: 46% for CA550, 77% of the CA725, and 70% for the CA750.**

STATUS: Complete.

The goals for 2013 were increased from earlier projections to the following percentages: CA550 – 51%; CA725 – 85%; and CA750 -74%. All goals were exceeded. CA550 = 72.9%; CA725 = 87.1%; and CA750 = 80%.

CHALLENGES: No challenges encountered.

c) **IDEM will work with U.S. EPA to establish specific goals for the land revitalization initiative.**

STATUS: Ongoing.

IDEM continues to work with U.S. EPA to establish these specific goals.

CHALLENGES: No challenges encountered.

Hazardous Waste Permitting and Post-Closure		L-2
Contact(s): Vic Windle	U.S. EPA Contact(s): Jae Lee	Due Date: June 30, 2012 and June 30, 2013
U.S. EPA Role: Provide program assistance.		
Goal 3: Cleaning up communities and advancing sustainable development. **Objective 3.2: Preserve land.** **Funding: Federal**		

Complete hazardous waste facility permitting actions in accordance with U.S. EPA Government Performance and Results Act (GPRA) goals. Priority will be given to permit application submittals that are subject to Indiana's permit accountability statute. U.S. EPA is in the process of developing 2011-2015 permit and renewal baselines. The baseline will be completed by the end of June 2011.

a) **Issue permit renewals to 100% of the 2011-2015 baseline facilities whose expiration dates are before September 3, 2013, by September 30, 2013.**

STATUS: Complete.

All permits continue to be renewed well ahead of state statutory time frames as well as agency "metric" time frames.

CHALLENGES: No challenges encountered.

b) **Bring 98% of the 2011-2015 baseline facilities "under control" (permit or order) by September 30, 2013.**

STATUS: Complete.

CHALLENGES: No challenges encountered.

Resource Conservation and Recovery Act (RCRA) Hazardous Waste Inspections of Generators		L-3
Contact(s): Susan Lowry & John Crawford	U.S. EPA Contact(s): Lorna Jereza	Due Date: June 30, 2012 and June 30, 2013
U.S. EPA Role: Conduct inspections at, at least six large quantity generators (LQGs). Inspect other installations handling hazardous waste: Criteria for U.S. EPA's selection of installations include: (a) Requests from IDEM, (b) Installations subject to open Federal enforcement judicial and/or administrative decrees/orders, (c) Installations that have not been inspected in the past, (d) Installations under Regional and National priority sectors and/or initiatives.		
Goal 3: Cleaning up communities and advancing sustainable development. **Objective 3.2: Preserve land.** **Funding: Federal**		

Annually, IDEM will conduct a Compliance Evaluation Inspection (CEI) at generators identified in the RCRAInfo database.

a) At least 20% of the large quantity generator (LQG) universe that exists as of June 1 of that respective year will be inspected.

STATUS: Complete.

On June 1, 2011, the RCRAInfo database showed 482 LQGs, resulting in an EnPPA commitment of 97 inspections (482 x .20 = 97) for FY 2012. As of June 30, 2012, IDEM completed approximately 146 LQG inspections.

On June 1, 2012, the RCRAInfo database showed 539 LQGs, resulting in an EnPPA commitment of 108 inspections (539 x .20 = 108) for FY 2013. As of June 30, 2013, IDEM completed approximately 148 LQG inspections (27%).

CHALLENGES: No challenges encountered.

Resource Conservation and Recovery Act (RCRA) Hazardous Waste Inspections of Treatment, Storage and Disposal Facilities (TSDs)		**L-4**
Contact(s): Susan Lowry & John Crawford	U.S. EPA Contact(s): Lorna Jereza	Due Date: June 30, 2012 and June 30, 2013
U.S. EPA Role: U.S. EPA R5 will independently inspect the boiler and industrial furnace units at all four TSDs every other year, and inspect at least two additional operating TSDs for all permit requirements for each year. U.S. EPA will perform annual inspections at all operating TSDs owned or operated by state and local governments.		
Goal 3: Cleaning up communities and advancing sustainable development. **Objective 3.2: Preserve land.** **Funding: Federal**		

a) Each fiscal year, IDEM will inspect 50% of all TSDs with a current operating permit for active permitted units.

STATUS: Complete.

As of June 30, 2012, IDEM completed Compliance Evaluation Inspections (CEI) at 14 of 16 (87%) permitted TSDs.

As of June 30, 2013, IDEM completed Compliance Evaluation Inspections (CEI) at 15 of 16 (93%) permitted TSDs. Note: U.S. EPA R5 has committed to perform annual inspections at Purdue University, which is a TSD that is owned and operated by the state.

CHALLENGES: No challenges encountered.

b) IDEM will perform inspections annually at operating TSDs owned or operated by the federal government.

STATUS: Complete.

IDEM conducted Compliance Evaluation Inspections (CEI) at the U.S. Naval Warfare Center in FY12 and FY13. The U.S. Naval Warfare Center is the only operating TSD owned or operated by the federal government in Indiana.

CHALLENGES: No challenges encountered.

Resource Conservation and Recovery Act (RCRA) Hazardous Waste Enforcement		**L-5**
Contact(s): Nancy Johnston	U.S. EPA Contact(s): Lorna M. Jereza	Due Date: June 30, 2012 and June 30, 2013

U.S. EPA Role: Issue enforcement responses to RCRA violations detected by U.S. EPA, or referred to U.S. EPA by IDEM, in accordance with U.S. EPA's 2003 Hazardous Waste Civil Enforcement Response Policy, U.S. EPA's RCRA Civil Penalty Policy and relevant U.S. EPA enforcement strategies.

Goal 3: Cleaning up communities and advancing sustainable development.
Objective 3.2: Preserve land.
Funding: Federal

a) **Issue enforcement responses to RCRA violations in accordance with IDEM's enforcement response strategy and U.S. EPA's 2003 Hazardous Waste Civil Enforcement Response Policy.**

STATUS: Ongoing.

IDEM continues to issue enforcement responses in accordance with U.S. EPA's 2003 Hazardous Waste Enforcement Response Policy and appropriate IDEM policies. From July 1, 2011 through June 18, 2012, the Compliance and Enforcement Sections issued 250 informal enforcement actions. Between July 1, 2011 and June 30, 2012, the Enforcement Section issued 28 Agreed Orders, 61 Proposed Agreed Orders, three Commissioner's Orders, one Referral to the AG, and one Civil Enforcement Action. A total of 23 new SNC determinations were made. From July 1, 2012 through June 30, 2013, the enforcement section issued 31 Agreed Orders, 68 Proposed Agreed Orders, one Commissioner's Order, four Referrals to the AG, and five Civil Enforcement Actions. A total of 19 new SNC determinations were made. In addition, the Enforcement Section issued enforcement actions for non-PPG related activities, including solid and industrial waste management, auto salvage sites, land application, waste tires, confined feeding, and spills investigated by Emergency Response.

CHALLENGES: No challenges encountered.

Polychlorinated Biphenyl (PCB) Inspections **L-6**

Contact(s): Theresa Bordenkecher | U.S. EPA Contact(s): Kendall Moore | Due Date: June 30, 2012 and June 30, 2013

U.S. EPA Role: Review IDEM's PCB inspection reports and, if necessary, issue the appropriate enforcement response. Provide technical assistance and guidance on federal PCB regulations. Conduct mid-year and year-end reviews. Provide continuing, refresher training to experienced inspectors and basic field investigation training to new inspectors.

Goal 4: Ensuring the safety of chemicals and preventing pollution.
Objective 4.1: Ensure chemical safety.
Funding: Federal

a) **Conduct 27 TSCA PCB inspections for FY12 and 27 PCB inspections for FY13.**

STATUS: Complete.

As of June 30, 2013, IDEM conducted inspections at 27 facilities.

CHALLENGES: No challenges encountered.

b) **Inspection reports will include penalty calculations when violations are identified.**

STATUS: Ongoing.

No specific violations were identified during FY13 where this task would be applicable.

CHALLENGES: No challenges encountered.

c) **IDEM will continue to participate in U.S. EPA's current electronic inspection pilot program. IDEM will provide feedback on issues and/or improvements that can be made to hardware and software for this e-field activity.**

STATUS: Ongoing.

IDEM is in the process of developing a PCB template that is compatible with the existing Digital Inspector system. The software is being tested in the field. After testing, IDEM will investigate the possibility of improved hardware to further enhance the field capabilities of this system.

CHALLENGES: The constantly changing nature of software and hardware technology is a challenge. This project requires a high level of technical support, which can be a resource issue.

d) **Continue to oversee PCB cleanups and provide technical assistance to the regulated community. Provide a yearly summary report detailing the status of oversight activities for each fiscal year.**

STATUS: Ongoing.

For FY13, IDEM has been providing oversight and technical assistance at seven known sites, and work continues at four of these sites.

CHALLENGES: As is the case with remedial activities, parties are hesitant to involve U.S. EPA R5.

e) **Work with PTCS in the annual targeting of facilities for TSCA PCB inspections, including critical points within natural gas pipeline transmission and distribution systems.**

STATUS: Ongoing.

For FY13, IDEM identified and inspected four natural gas pipeline transmission and distribution systems. IDEM will continue to coordinate targeting efforts.

CHALLENGES: No challenges encountered.

f) **IDEM will provide a quarterly inspection summary in lieu of individual FITS forms.**

STATUS: Ongoing.

Summary reports have been provided to U.S. EPA R5.

CHALLENGES: No challenges encountered.

Resource Conservation Recovery Act (RCRA) RCRAInfo		**L-7**
Contact(s): Greg Overtoom	U.S. EPA Contact(s): Allen Melcer	Due Date: Monthly.
U.S. EPA Role: Provide program assistance.		
Goal 4: Ensuring the safety of chemicals and preventing pollution. **Objective 4.1: Ensure chemical safety.** **Funding: Federal**		

Resource Conservation and Recovery Act (RCRA) information will be input into the RCRAInfo database on a monthly basis.

a) **IDEM will migrate the Indiana RCRA Activities Tracking System (IRATS) into the agency's Environmental Information System (EIS), IDEM's agency-wide database. IRATS migration into the EIS is tentatively scheduled for the fourth quarter of 2011. Once fully integrated the EIS will be used to track all RCRA related regulatory activities and IRATS will be decommissioned. The handler data flow from IRATS to RCRAInfo via IDEM's National Environmental Information Exchange Network (NEIEN) node developed in 2005-2007 will be modified to use the EIS data rather than IRATS.**

STATUS: Ongoing.

IDEM started this project and has a projected completion date during the first half of calendar year 2013.

CHALLENGES: No challenges encountered.

b) **IDEM will develop field-based electronic forms for collecting RCRA compliance inspection information and synchronizing that information to IRATS and the EIS integration will be completed during the 3rd quarter of 2011.**

STATUS: Ongoing.

Inspection forms have been developed, tested and deployed for Windows XP-based computers. Further development is underway on report output and investigating field-based electronic forms for other operating systems such as iOS and Surface RT.

CHALLENGES: No challenges encountered.

c) **Develop Biennial Report online reporting application and migrate to EIS for the 2012 reporting year.**

STATUS: Ongoing.

The reporting application has been designed and we hope to implement it in 2014. Full implementation of the reporting application cannot be completed until modifications are made to IDEM's TEMPO360 database.

CHALLENGES: No challenges encountered.

d) **IDEM is committed to continue to work with U.S. EPA on completing the switch to the Exchange Network as the means for regulatory reporting wherever it makes good business sense.**

STATUS: Not started.

IDEM has begun mapping data between our TEMPO360 database and the RCRAInfo Exchange Network dataflow schema.

CHALLENGES: No challenges encountered.

Rule Development		**L-8**
Contact(s): Mike Dalton	U.S. EPA Contact(s):Mary Setnicar	Due Date: June 30, 2013
U.S. EPA Role: Many rule updates are promulgated by U.S. EPA and IDEM mutually agreed upon time frames. Regarding the Research, Development and Demonstration Rule (RDD), U.S. EPA will provide assistance where applicable.		

Goal 5: Enforcing environmental law.
Objective 5.1: Enforce environmental law.
Funding: Federal

Develop equivalent legislation, regulations and program revision applications for RCRA and hazardous and solid waste amendments (HSWA) / non-HSWA provisions for which the state is prepared to seek authorization and submit current and future authorization packages within a mutually agreed upon time frame.

a) IDEM will promulgate and pursue authorization for all RCRA Subtitle C annually and Subtitle I rules as needed.

STATUS: Ongoing.

Indiana submitted ARAs 21 through 23 and final authorization was published in the Federal Register on June 6, 2013 (78 FR 33986). IDEM will continue to update its rules to remain current with those published by U.S. EPA after FY11.

CHALLENGES: Indiana will continue to pursue legislative changes necessary to address the outstanding issues with Office of Regional Counsel (ORC).

Confined Animal Feeding Operations (CAFO) Inspections		**L-9**
Contact(s): Charles Grady & Travis Goodwin	U.S. EPA Contact(s): Steve Jann & Pat Kuefler	Due Date: June 30, 2012 and June 30, 2013
U.S. EPA Role (Water Division): Provide training on conducting CAFO inspections to IDEM staff, as requested. U.S. EPA R5 will be leading on enforcement where there is non-compliance with existing federal orders or where non-compliance is documented through a federal lead inspection.		

Goal 3: Cleaning up communities and advancing sustainable developments.
Objective 3.2: Preserve land.
Funding: Federal

a) Conduct compliance inspections at 20% of all CAFOs each fiscal year.

STATUS: Complete.

The Agricultural and Solid Waste Compliance Section staff conducted 214 inspections of CAFOs this fiscal year. This represents approximately 33% of the 658 CAFOs in the state.

CHALLENGES: No challenges encountered.

b) Issue NPDES permits to all CAFOs within Indiana's statutory time frames.

STATUS: Ongoing.

As of September 30, 2013, 10 of 653 CAFOs within Indiana are operating under NPDES CAFO permits. In accordance with the March 15, 2011, Fifth Circuit decision in *National Pork Producers Council v. EPA,* the remaining 643 large CAFOs do not need NPDES CAFO permits and are operating under approvals issued under Indiana's Confined Feeding Operations (CFO) rule. IDEM will continue to issue NPDES permits and CFO Approvals within Indiana's statutory time frames.

CHALLENGES: No challenges encountered.

Water Quality

Impaired Waters List and Water Quality Report		W-1
Contact(s): a) Marylou Renshaw & Jody Arthur, b) Marylou Renshaw	U.S. EPA Contact(s): a) Peter Swenson & Jonathan Burian, b) Linda Holst, Ed Hammer & Mari Nord	Due Date: a) April 1, 2012, b) December 31, 2011 & December 31, 2012
U.S. EPA Role: Timely review and comment on materials submitted. Provide guidance on report/list development. Provide continued support and guidance on the use of the Assessment Database.		
Goal 2: Protecting America's waters. **Objective 2.2: Protect and restore watersheds and aquatic eco-systems.** **Funding: Federal**		

a) Use the Assessment Database (ADB) to submit the Integrated Report (IR), including 303(d) list of impaired waters by established deadlines for all relevant information. Complete quality assurance of information in ADB to ensure consistency with 303(d) list and other IR categories. Provide additional IR information (e.g., assessment methodology, GIS files) in other appropriate formats as required by the IR Guidance (U.S. EPA PAM WQ-7).

STATUS: Ongoing.

IDEM submitted its 2012 Integrated Report and 303(d) List of Impaired Waters to U.S. EPA R5 in April 2012. The submission package included all components required by CWA Sections 305(b) and 303(d) of the CWA and most that are recommended in U.S. EPA IR guidance. At the time of submittal, IDEM's 90-day public comment period on the 303(d) list, which ended on May 31, 2012, was still in effect. IDEM submitted to U.S. EPA R5 an addendum to the 2012 Integrated Report on December 28, 2012, which included public comments received along with the recommended responsiveness summary and additional changes to the 303(d) list based on IDEM's statewide reassessment of fish tissue data using new assessment methods for methylmercury. Additional total maximum daily loads (TMDLs) were approved as well as other corrections identified after the April 1, 2012 submission.

CHALLENGES: U.S. EPA's delay in issuing its decision document regarding Indiana's 2010 303(d) list significantly complicated the development of the 2012 303(d) list and the Integrated Report because each 303(d) list builds upon the previously approved list.

b) Monitor waters, utilizing the probabilistic monitoring design to provide sufficient data to adequately assess the status of Indiana's surface water quality, following the schedule identified in the IDEM Monitoring Strategy. During the current sampling season (summer 2011) IDEM will sample a minimum of 38 sites in the White River, West Fork basins. Next sampling season (summer 2012) IDEM will sample a minimum of 38 sites in the Patoka River basin. (U.S. EPA PAM WQ-5)

STATUS: Ongoing.

The 2011 White River, West Fork Basin monitoring was completed. The 2012 Patoka River Basin monitoring was completed. The 2013 East Fork White River Basin monitoring was completed in October 2013.

CHALLENGES: A shortage of staff has slowed the initial phase of IDEM's chemical data assessment process. IDEM's chemical data assessment is now an automated process with criteria set in the Assessment Information Management System (AIMS) database. Additional employees have been hired and are in the process of training for biological community identifications (algae, fish, and macroinvertebrates) as well as database development and management skills to help eliminate the bottleneck of processing and entering the data for biological samples and producing results for assessments.

Total Maximum Daily Loads (TMDLs)		**W-2**
Contact(s): a) & c) Marylou Renshaw & Bonny Elifritz, b) Marylou Renshaw & Cyndi Wagner	U.S. EPA Contact(s): a) Peter Swenson b) Linda Holst & Ed Hammer	Due Date: a) September 30, 2011 & 2012, b) December 31, 2011 & 2012
U.S. EPA Role: a) Timely review and comment, and contractor assistance, b) Provide guidance/other information on identifying causes/sources of impairment.		
Goal 2: Protecting America's waters. **Objective 2.2: Protect and restore watersheds and aquatic eco-systems.** **Funding: State**		

a) **Total maximum daily loads (TMDLs) on water body segments – 90 TMDLs will be developed by September 30, 2011, and another 75 will be developed by September 30, 2012 with the number for 2013 to be determined in accordance with the pace set by U.S. EPA.**

STATUS: Ongoing.

By September 30, 2011, U.S. EPA approved 106 TMDLs for the following: 27 for bacteria in Cicero Creek Watershed, 54 for bacteria and three for nutrients in Pigeon-Highland River Watershed, and 22 bacteria in the Upper White River Watershed.

The Busseron Creek Watershed TMDL Report was submitted to U.S. EPA R5 on February 22, 2012 for a total of 16 TMDLs. The Salt Creek Watershed TMDL was submitted to U.S. EPA R5 on July 17, 2012 and the Pigeon River Watershed TMDL was submitted to U.S. EPA on July 30, 2012, accounting for 38 and 48 TMDLs respectively, giving IDEM a total of 86 TMDLs submitted and approved for 2012.

CHALLENGES: TMDL staffing was down for a significant portion of the 2011-2012 state fiscal year which impacted IDEM's ability to develop TMDLs. U.S. EPA R5 has not approved the Busseron TMDL as it is considering if/how to approve it due to the status of the Draft 2010 303d List and its concerns over IDEM's listing methodology for metals, which were discussed in the TMDL. If the Busseron Creek Watershed TMDL is not approved by U.S. EPA, IDEM will only receive credit for 68 TMDLs. The Busseron Creek TMDL submitted to U.S. EPA R5 on February 22, 2012 has yet to be approved.

b) **Targeted Monitoring Studies - Monitor waters to provide information on sources and causes of impairments for use in the development of TMDLs and/or watershed plans. Depending on resources and following the plans outlined in the IDEM Monitoring Strategy, IDEM will do one to ten studies per sampling season.**

STATUS: Ongoing.

Eighteen sites at Big Creek/White Oak were sampled and completed on April 13, 2012. Twenty-three sites at Sand Creek were sampled and completed on June 20, 2012.

CHALLENGES: IDEM's ability to conduct targeted monitoring studies requires a great deal of interdisciplinary planning, which is at times positive; however, it is made more difficult by limited resources and equipment and vehicle break-downs.

Wetland and Stream Impacts and Storm Water Permits		**W-3**
Contact(s): Mary Hollingsworth & Randy Braun	U.S. EPA Contact(s): a) Peter Swenson, b)Brian Bell	Due Date: a) & b) Ongoing.
U.S. EPA Role: Provide program assistance.		
Goal 2: Protecting America's waters. **Objective 2.2: Protect and restore watersheds and aquatic eco-systems.** **Funding: Federal/State (Wetlands Mapping Impacts Grant)**		

a) Review applications and issue appropriate permits for wetland and stream impacts.

STATUS: Ongoing.

For the reporting period of July 1, 2011 through June 30, 2013, the 401 Wetlands project managers reviewed and processed a total of 1,412 applications/permits. The applications included both regional general permit and individual permit applications. Staff is required to expedite the processing of applications while maintaining a high level of quality assurance and technical review. By statute, individual permit applications must be processed within 120 days (the program goal is to process each within 90 days). Regional general permit applications must be processed within 30 days. Staff has exceeded the internal program goals processing applications below the established days for applications for the first three quarters of the state fiscal year. The data is as follows:

- July 1, 2011 through April 1, 2012: 513 applications processed at an average of 42 days in comparison to the average target days of 66 days.
- April 1, 2012 through June 30, 2013: 899 applications processed at an average of 58 days in comparison to the average target days of 76 days.
- July 1, 2011 through June 30, 2013: 1,412 applications processed at an average of 52 days in comparison to the average target days of 72 days.

CHALLENGES: No challenges encountered.

b) Storm water permits – Review applications and issue appropriate permits for construction, municipal and industrial discharges of storm water.

STATUS: Ongoing.

July 1, 2011 through May 31, 2012 Processed:

- Construction site Run-off Permits: 1,333 new or renewed applications/permits.
- Industrial Storm Water Permits: 229 new or renewed applications/permits and 85 No Exposure Certifications.
- Municipal Storm Water Permits: There were no new MS4s established during this time frame.

June 1, 2012 through June 30, 2013 Processed:

- Construction site Run-off Permits: 1,825 new or renewed applications/permits.
- Industrial Storm Water Permits: 257 new or renewed applications/permits and 112 No-Exposure Certifications.
- Municipal Storm Water Permits: There were no new MS4s established during this time frame.

July 1, 2011 through June 30, 2013 Processed:

- Construction site Run-off Permits: 3,158 new or renewed applications/permits.
- Industrial Storm Water Permits: 486 new or renewed applications/permits and 197 No-Exposure Certifications.
- Municipal Storm Water Permits: There were no new MS4s established during this time frame.

CHALLENGES: No challenges encountered.

Office of Water Quality (OWQ) Permits		**W-4**
Contact(s): a) Paul Higginbotham & Jerry Dittmer, b) Paul Higginbotham & Stan Rigney	U.S. EPA Contact(s): a) Kevin Pierard, b) Kevin Pierard	Due Date: See below.
U.S. EPA Role: Provide timely review, technical assistance and comment and identify issues at an early stage in the process. Review and provide timely feedback 60 days after receipt of permit to ensure that IDEM reissues these permits by December 31, 2011. Review NPDES discharge permits greater than 5 MGD in the Lake Michigan basin and all direct dischargers to Lake Michigan.		
Goal 2: Protecting America's waters. **Objective 2.1: Protect human health.** **Funding: State**		

a) Municipal National Pollutant Discharge Elimination System (NPDES) Permits – Issue 95% of all identified priority backlogged NPDES permits, issue new permits within statutory timeframes.

- **Issue municipal priority permits within requested time frames.**

STATUS: Ongoing.

IDEM continues to issue the priority permits within the required time frames.

CHALLENGES: No challenges encountered.

- **Maintain the backlog of municipal permits at 10% or less.**

STATUS: Ongoing.

The backlog for municipal permits is currently at zero.

CHALLENGES: No challenges encountered.

- **Issue new municipal NPDES permits within statutory time frames.**

STATUS: Ongoing.

IDEM continues to issue any new NPDES permits within statutory time frames.

CHALLENGES: No challenges encountered.

b) **Industrial NPDES permits – Issue 95% of all identified priority backlogged NPDES permits, issue new permits within statutory timeframes.**

- **Issue industrial priority permits within requested timeframes.**

STATUS: Ongoing.

IDEM has issued 95% of all identified priority backlogged NPDES permits, and issues new permits within statutory time frames.

CHALLENGES: No challenges encountered.

c) **Maintain the backlog of industrial permits to 10% or less.**

STATUS: Ongoing.

The industrial permit backlog is less than 10% (less than 0.3% as of June 2013).

CHALLENGES: No challenges encountered.

d) **Issue new industrial NPDES permits within statutory timeframes.**

STATUS: Ongoing.

All new industrial permits are issued within required statutory time frames.

CHALLENGES: No challenges encountered.

e) **Re-issue all identified major industrial permits which have expired for more than 10 years by the end of calendar year, December 31, 2011.**

STATUS: Ongoing.

IDEM re-issued all identified major industrial permits which expired more than 10 years ago by the end of calendar year, December 31, 2011.

CHALLENGES: No challenges encountered.

f) **Re-issue all identified major industrial permits which have expired for more than 10 years by end of calendar year, December 31, 2011; includes Arcelor Mittal East IN0000175 and Arcelor Mittal West IN0000205**

STATUS: Complete.

IDEM re-issued all identified major industrial permits which expired more than 10 years ago by end of calendar year, December 31, 2011, including Arcelor Mittal East IN0000175 and Arcelor Mittal West IN0000205.

CHALLENGES: No challenges encountered.

Compliance Monitoring Strategy (CMS) for Wet Weather Programs, Combined Sewer Overflow (CSO) Long Term Control Plans (LTCP), Sanitary Sewer Overflow (SSO) and Storm Water		**W-5**
Contact(s): a) & b) Paul Higginbotham & Jerry Dittmer, c) Mark Stanifer, d)-g) Mary Hollingsworth & Randy Braun	U.S. EPA Contact(s):Kevin Pierard, Jack Bajor & Patrick Kuefler	Due Date: See below.

U.S. EPA Role: U.S. EPA will be the lead on certain environmentally significant CSO communities, working in partnership with IDEM to reach agreement on approvable long-term control plans and implementation schedules. U.S. EPA will provide timely review and comment on technical non-rule policy and other documents submitted by IDEM.
Goal 5: Enforcing environmental laws. **Objective 5.1: Enforce environmental laws.** **Funding: State**

Implement the state-specific CMS for National Wet Weather Priorities. CAFO inspections will be conducted by the Office of Land Quality (see L-9).

a) **IDEM will participate in the review and approval of the long term control plans and consent decree issues in combined sewer overflow (CSO) cases under federal lead, including Evansville, Jeffersonville, Gary, Hammond, Mishawaka, South Bend, Elkhart, Anderson, Fort Wayne and Indianapolis.**

STATUS: Ongoing.

IDEM legal and Office of Water Quality (OWQ) staff continue to work with U.S. EPA on the monitoring of progress of the 10 major POTWs operating under Consent Decrees addressing CSO issues.

CHALLENGES: No challenges encountered.

b) **IDEM will continue long term control plans (LTCP) compliance implementation.**

- **Monitoring milestone dates in the LTCP through site visits, and review of documentation.**
- **Monitoring compliance with limits (as applicable) through review of submitted monitoring reports.**
- **Reviewing periodically the approved LTCPs.**
- **Setting meetings (as needed) with communities and their consultants on the status of the implementation of the LTCPs.**
- **Confirm, by September 30, 2011, the elimination of CSO outfalls within one mile or less of drinking water intakes.**

STATUS: Ongoing.

IDEM continues to work on LTCP compliance. The elimination of CSO outfalls near drinking water intakes is confirmed.

CHALLENGES: No challenges encountered.

c) **There is no set inspection frequency or goal for Sanitary Sewer Overflows (SSO) inspections. Inspections will be scheduled as needed, based on information about overflow occurrences.**

STATUS: Ongoing.

Staff of the Inspections Section conducted the following inspections that include a component for evaluating SSOs during the past two FFYs:

- 2012: 86 Major POTW CEIs plus 164 Minor POTW CEIs = 250
- 2013: 76 Major POTW CEIs plus 195 Minor POTW CEIs = 271

CHALLENGES: No challenges encountered.

d) **IDEM will administer storm water programs by performing compliance inspections in the following areas: Construction/land disturbance, industrial and municipal separate storm sewer systems (MS4s).**

- **Construction/Land Disturbance (327 IAC 15-5): Inspect permitted construction sites and review storm water pollution prevention plans, giving highest importance to those projects for which the agency has received complaints.**

  STATUS: Ongoing.

  The highest priority for compliance is placed on field inspections. Inspections are prioritized with an emphasis on complaint sites; however, inspections are also conducted based on geographic regions and high profile construction sites. In the last few years, staff responsible for construction site inspections have placed a greater emphasis on the audit of MS4 Construction Site Run-off programs by performing audits. The following information is associated with reporting for construction sites:

  - Inspections:
    - July 1, 2012 – May 31, 2012: 241 Active Construction Sites
    - June 1, 2012 – June 30, 2013: 290 Active Construction Sites
    - July 1, 2011 – June 30, 2013: 531 Active Construction Sites

  - Plan Reviews:
    - July 1, 2012 – May 31, 2012: 64 Construction Sites
    - June 1,2012 – June 30, 2013: 121 Construction Sites
    - July 1, 2011 – June 30, 2013: 185 Construction Sites

  CHALLENGES: No challenges encountered.

- **Municipal Separate Storm Sewer System (327 IAC 15-13): Inspections of Phase I MS4s should be conducted on an as needed basis, and before October 2012. By October 2014, conduct an appropriate combination of audits and inspections to determine compliance of Phase II MS4s.**

  STATUS: Ongoing.

  Audits are being conducted in phases to assess compliance and program status of each of Indiana's Phase II MS4 entities.

  - The regional storm water specialists are conducting audits of the MS4 construction run-off minimum control measure (MCM). The audits not only include an overall assessment of this MCM, but also individual inspections of MS4 owned and operated projects for compliance with the storm water construction rule, 327 IAC 15-5, Rule 5. Audits completed for the construction MCM: Staff conducted 11 audits during the review period. For the time period of June 1, 2012 through June 30, 2013 a total of eight audits were completed, totaling 19 audits beginning in July 2011.

- The MS4 coordinator is conducting audits of the public education, public involvement, and good housekeeping MCMs. Twelve audits were completed for these three MCMs during the review period. No additional audits completed for this MCM as the focus was placed on the Illicit Discharge Audits.

CHALLENGES: No challenges encountered.

- **IDEM will evaluate and develop a process to complete audits of the illicit discharge and post-construction minimum control measures.**

  STATUS: Ongoing.

  Storm Water Program staff have started this process by developing a field assessment form for the illicit discharge minimum control measure (MCM). The form is being initially piloted as part of the audit of five MS4 entities. The post-construction component process has not yet been developed. However, the regional storm water specialists have been monitoring the implementation of post-construction storm water quality measures when performing audits on the construction run-off MCM and inspecting MS4-owned and operated projects and those that are privately owned (non-public) within an MS4 jurisdictional area.

  Audits are being conducted in phases to assess compliance and program status of each of Indiana's Phase II MS4 entities.

  - The MS4 coordinator is conducting audits of the Illicit Discharge Detection and Elimination (IDDE) MCM.
  - March 9, 2012 through May 30, 2012 a total of five audits were completed.
  - June 1, 2012 through June 30, 2013 a total of 87 audits were completed.

  CHALLENGES: No challenges encountered.

- **IDEM will evaluate and refine their audit standard operating procedure, and ascertain the time requirements in order to set annual audit goals.**

  STATUS: Ongoing.

  During the initial pilot process, as described above, IDEM is evaluating the overall process and will assign realistic goals and objectives based on program priorities and other initiatives.

  CHALLENGES: No challenges encountered.

- **Industrial Storm Water (327 IAC 15-6): Inspections will include operational facilities as well as facilities that have claimed an exemption, and/or facilities that have been the subject of complaints.**

  STATUS: Ongoing.

  Inspections are prioritized based on complaints, but other factors may trigger an inspection, including those facilities that filed for an exemption under the rule. During the review period, nine inspections were completed for industrial sites. For the time period of June 1, 2012 through June 30, 2013 a total of 61 inspections of industrial facilities, subject to 327 IAC 15-6 were completed, totaling 70 beginning in July 2011.

CHALLENGES: Progress was delayed during this reporting period, as there were several vacancies in the section. At this time, the section is being reorganized to allow current field staff that do construction inspections to inspect industrial sites for storm water issues

e) **Evaluate storm water violations and take timely action in accordance with the state's NPDES enforcement management system.**

STATUS: Ongoing.

Staff of the Storm Water Section continues to address violations as they are identified. IDEM continues to implement its EMS with formal enforcement action being initiated when referred from the Storm Water Section to the Enforcement Section.

CHALLENGES: No challenges encountered.

f) **Track storm water compliance monitoring and compliance assurance actions in accordance with established data requirements and reporting timeframes.**

STATUS: Ongoing.

Storm water inspections are not currently being entered into ICIS-NPDES due to resource constraints. Storm water inspections will eventually be entered into TEMPO, a comprehensive IDEM database. TEMPO is currently in the development stages. The storm water programs are some of the first programs to be incorporated into TEMPO for permitting and tracking purposes. Work is also underway to develop the capability for storm water data in TEMPO to be uploaded into ICIS-NPDES.

CHALLENGES: The lack of resources prevents the entering of storm water data into ICIS.

g) **Report storm water CMS inspection numbers at mid-year, and at the end of the federal fiscal year. Review plans and commitments prior to the beginning of the federal fiscal year, and at mid-year. Variations from the inspection frequencies and proposed revisions to numerical end-of-year commitments will be justified (i.e. issues related to staffing, funding, etc.).**

STATUS: Ongoing.

IDEM reports inspection numbers as agreed to in the CMS by entering them into ICIS.

CHALLENGES: No challenges encountered.

Joint State/U.S. EPA R5 Clean Water Act Enforcement and Permitting Work Plan		**W-6**
Contacts: a) Mary Hoover b) Paul Higginbotham and Mark Stanifer	U.S. EPA Contacts: James Coleman, Jack Bajor & Patrick Kuefler	Due Date: Annual Basis.
U.S. EPA Role: Lead, assist or work share as specified in the annual work plan. The Region will submit a summary report to headquarters on behalf of the state by December 31, 2011 and annually thereafter. Take action to improve performance if IDEM is not meeting performance expectations. Ensure compliance with all federal consent decrees and administrative orders.		
Goal 5: Enforcing environmental laws. **Objective 5.1: Enforce environmental laws.** **Funding: Federal/State (Permitting and Enforcement Grant)**		

U.S. EPA and IDEM, working together, will conduct a CWA annual planning process to

identify and discuss national, regional and state priorities versus available resources at both the state and federal levels consistent with CWA Action Plan guidance to be concluded no later than September 30. The resulting collaborative annual work plans will use all available mechanisms to get work done, such as federal and state work sharing, innovative approaches to monitoring facilities or addressing violations, etc.

a) **Cooperate in developing and implementing the annual Joint State/U.S. EPA R5 CWA Enforcement and Permitting Work Plan.**

- **Participate in annual planning meetings to develop collaborative annual work plans which may be conducted during the initial and/or midterm EnPPA evaluations.**

  STATUS: Ongoing.

  OWQ has and will continue working with U.S. EPA R5 in developing the annual joint work plan.

  CHALLENGES: No challenges encountered.

- **Participate in routine and regular meetings to discuss progress toward meeting annual permitting and enforcement commitments, and how the state has been performing overall in the NPDES program.**

  STATUS: Ongoing.

  OWQ compliance and permits staff continue to participate in routine meetings with U.S. EPA R5 to discuss progress.

  CHALLENGES: No challenges encountered.

b) **Track priorities established and selected for each FFY. Select priorities for FFY11-13 include focusing on:**

- **Significant noncompliance (SNC) by major and minor facilities.**
- **Hands-on operator assistance to mixed ownership and state facilities.**
- **Reducing SNC violations for late or missing discharge monitoring reports (DMRs).**
- **Non-SNC violations and state agreed order compliance schedules.**
- **Reducing sanitary sewer overflows (SSOs).**
- **Industrial pretreatment.**
- **Updating permit templates as needed.**
- **Timely permit issuance.**
- **Reissuing expired permits that are 10 years or older.**
- **IDEM nutrient monitoring strategy to reduce nitrogen and phosphorous loadings to water bodies.**

  STATUS: Ongoing.

  This list represents many of our priorities and OWQ compliance, enforcement and permits staff continue to dedicate significant resources to these issues on a daily basis.

  CHALLENGES: No challenges encountered.

Compliance Monitoring Strategy (CMS) for Core National Pollution Discharge Elimination System (NPDES) Programs		W-7
Contact(s): a) Mark Stanifer & Don Daily, b) Mark Stanifer, c)–i) Mark Stanifer & Gary Starks	U.S. EPA Contact(s): James Coleman, Jack Bajor & Patrick Kuefler	Due Date: a), b), c), d), g), h) Annual Basis; e), f), i) Ongoing.
U.S. EPA Role: Provide program assistance.		
Goal 5: Enforcing environmental laws. **Objective 5.1: Enforce environmental laws.** **Funding: State**		

U.S. EPA's national CMS began Oct. 1, 2009 and ends September 30, 2013, with implementation over five annual inspection cycles. Indiana's continuing state-specific CMS for purposes of this EnPPA agreement, runs from October 1, 2011 through September 30, 2013. The goal is to maintain an adequate enforcement and compliance assistance program to help ensure that NPDES violations are prevented and if violations occur, they are adequately addressed.

a) **NPDES Compliance Inspections from October 1, 2011 through September 30, 2013:**

- **Majors: Conduct compliance evaluation inspections (CEI) or compliance sampling inspections (CSI) at 50% of major NPDES facilities annually. The goal is that 100% of the universe will receive a CEI or CSI inspection every two years in accordance with the national CMS.**

  STATUS: Ongoing.

  OWQ inspections staff conducted the following inspections at Major NPDES permit holders during the past two FFYs, excluding Mixed Ownership (MXOs), also known as semi-public. The universe is 188, excluding MXOs.

  - 2012: 161 inspections at Majors (85.6%); 121 of those were CEIs (64.4%)
  - 2013: 168 inspections at Majors (89.4%); 117 of those were CEIs (62.2%)

  CHALLENGES: The requested information for the points in part W7 (CMS) are based on the FFY of October 1 through September 30, even though the EnPPA otherwise evaluates performance over state fiscal years.

- **Minors: Municipal and Industrial "IN0" Facilities: Traditional minor NPDES facilities, for purposes of the EnPPA, include individual non-major municipal and industrial facilities beginning with "IN0." Conduct inspections at 50% of "traditional" minor NPDES facilities annually. Half of those inspections are to be CEIs or CSIs. The goal is that 100% of the universe will receive some type of inspection every two years and 100% of the universe will receive a CEI or CSI inspection every four years.**

  STATUS: Ongoing.

  OWQ inspections staff conducted the following inspections at Minor municipal and industrial NPDES permit holders during the past two FFYs, excluding MXOs. The universe is 716.

- 2012: 556 inspections (77.7%); 298 of those were CEIs or CSIs (41.6%)
- 2013: 603 inspections (84.2%); 341 of those were CEIs or CSIs (47.6%)

CHALLENGES: See comment above.

- **Minors – Industrial Pretreatment "INP": Conduct compliance evaluation inspections (CEI) at 100% of the universe every two years.**

  STATUS: Ongoing.

  OWQ inspections staff conducted the following inspections at state-issued industrial pretreatment permit holders (INPs) during the past two FFYs. The universe is 162.

  - 2012: 105 inspections (64.8%); 72 of those were CEIs (44.4%)
  - 2013: 120 inspections (74.1%); 88 of those were CEIs (54.3%)

  CHALLENGES: See comment above.

- **Minors – state and federal "IN0" facilities: Conduct compliance evaluation inspections (CEI) at 100% of the universe every two years.**

  STATUS: Ongoing.

  OWQ inspections staff conducted the following inspections at state and federal NPDES permit holders during the past two FFYs. The universe is 46.

  - 2012: 41 inspections (89.1%); 18 of those were CEIs (39.1%)
  - 2013: 35 inspections (76.1%); 27 of those were CEIs (58.7%)

  CHALLENGES: The inspection of state parks lags early in the year because these typically need to be inspected during the summer months. Additionally, see comment above.

- **Major and Minor Mixed Ownership or Semi-Public Facilities: Conduct compliance evaluation inspections (CEI) or compliance sampling inspections (CSI) at 50% of mixed ownership NPDES facilities annually. The goal is 100% of the universe will receive a CEI or CSI inspection every two years.**

  STATUS: Ongoing.

  OWQ inspections staff conducted the following inspections at Major and Minor MXO NPDES permit holders during the past two FFYs. The universe is 281.

  - 2012: 263 inspections (93.6%); 160 of those were CEIs or CSIs (56.9%)
  - 2013: 296 inspections (105.3%); 178 of those were CEIs or CSIs (63.3%)

  CHALLENGES: See comment above.

- **Respond to 100% of complaints.**

  STATUS: Ongoing.

  OWQ has responded to 100% of submitted complaints.

  CHALLENGES: No challenges encountered.

b) Pretreatment Audits:

- **Conduct nine industrial pretreatment audits annually (20% of approved local pretreatment programs).**

  STATUS: Ongoing.

Ten industrial pretreatment audits were completed during FY 12, and nine were conducted during FY 13.

CHALLENGES: No challenges encountered.

c) **Quality assurance/quality control (QA/QC):**

- **Conduct QA/QC reviews of submitted self-monitoring data to evaluate reliability.**

  STATUS: Ongoing.

  QA / QC of paper DMR monitoring results are ongoing on an established monthly schedule, and this process continues to be part of IDEM's implementation of the NPDES program.

  CHALLENGES: No challenges encountered.

d) **Significant non-compliers (SNC):**

- **Goals are to maintain the SNC rate for majors below 10%, and the size of the active exceptions list below 2%, both as measured on a quarterly basis. SNC rate and active exceptions list shall be below 17% on an annual basis.**

  STATUS: Ongoing.

  The major SNC rate for the four quarters of FFY 13 was 5.7% for the first quarter, 7.8% for the second quarter, 8.9% for the third quarter, and 10.9% for the fourth quarter. A query from the epa-otis.gov SRF metrics (metric 8a2) indicates an overall SNC rate of 16.2% (32 of 198) for FFY 13, compared to the national average of 25%. IDEM understands that the "exceptions list" has been discontinued and has been superseded and replaced by the "watch list."

  CHALLENGES: No challenges encountered.

- **Monitor facilities on the watch list and take action as appropriate.**

  STATUS: Ongoing.

  Facilities on the watch list are reviewed with U.S. EPA during the periodic "Major SNC" calls. The most recent official watch list is dated July 2013, but OTIS lists the August 2013 list as well. Of the six listed permittees, only one major permit holder on the August watch list (NIPSCO Bailly) is not currently under a state Agreed Order or federal Consent Decree. NIPSCO appears to be missing a DMR that was submitted long ago.

  CHALLENGES: No challenges encountered.

e) **Evaluate all violations and take timely action in accordance with the state's NPDES enforcement management system.**

STATUS: Ongoing.

Reportable and significant violations that are identified by compliance and inspections staff are addressed with either informal or formal actions, in accordance with IDEM's enforcement management system.

CHALLENGES: No challenges encountered.

f) **Enter waste water compliance monitoring and compliance assurance actions into ICIS-NPDES in accordance with established data requirements and reporting timeframes.**

STATUS: Ongoing.

DMRs, inspection reports, and final enforcement actions for NPDES facilities continue to be entered into ICIS-NPDES on an ongoing basis as part of IDEM's management and implementation of the NPDES program.

CHALLENGES: No challenges encountered.

g) Report waste water CMS inspection numbers at mid-year, and at the end of the federal fiscal year. Review plans and commitments prior to the beginning of the federal fiscal year, and at mid-year. Variations from the inspection frequencies and proposed revisions to numerical end-of-year commitments will be justified (i.e. issues related to staffing, funding, new priorities, etc.).

STATUS: Ongoing.

As indicated in each of the inspection categories reported above, Indiana expects to achieve its inspection commitments, and will continue reporting them to U.S. EPA R5.

CHALLENGES: No challenges encountered.

h) Cooperate in the State Review Framework (SRF) Indiana review by providing data, in-person management and staff interviews, etc., needed to assess IDEM's performance of compliance monitoring and enforcement activities in accordance with negotiated commitments. Address concerns identified during SRF reviews.

STATUS: Ongoing.

During the review period, IDEM worked with U.S. EPA R5 to complete the SRF process. IDEM has also committed to making some changes in its processes to satisfy concerns that were raised by U.S. EPA R5, and IDEM is currently implementing those changes.

CHALLENGES: No challenges encountered.

Safe Drinking Water Act (SDWA)		**W-8**
Contact(s): a) Pat Carroll & Stacy Jones; b)-e) Pat Carroll & Al Lao, f) Pat Carroll & Liz Melvin	U.S. EPA Contact(s): Tom Poy	Due Date: a)-d) Ongoing, e) Annually, f) Ongoing.
U.S. EPA Role: a) Review and approve rules, b) Maintain and update the SDWIS database including the state version, SDWIS-state, c) provide compliance assistance, d) no role identified, e) take necessary enforcement action to help reduce the level of non-compliance among small water systems, and f) provide support for continued development and improvement of the electronic sanitary survey form.		
Goal 2: Protect America's waters. **Objective 2.1: Protect human health.** **Funding: Federal**		

a) Implement new federal safe drinking water rules, including re-codifying state rules as outlined in the Annual Resource Deployment Plan (ARDP).

STATUS: Ongoing.

The following state rules became effective on June 6, 2010: Stage 2 Disinfectants and Disinfection By-products Rule; Long Term 2 Enhanced Surface Water Treatment Rule; Ground Water Rule; and Lead and Copper Rule Short Term Revisions. IDEM is working with U.S. EPA to address any deficiencies to gain primacy for these rules.

CHALLENGES: No challenges encountered.

b) **Submit all required federal reporting requirements within the required reporting period. This will be done through the Annual Resource Deployment Plan (ARDP) where items overlap.**

STATUS: Ongoing.

The final FY12 ARDP was submitted to U.S. EPA R5 on September 2012. The final FY13 ARDP will be submitted to U.S. EPA R5 by December 1, 2013.

CHALLENGES: No challenges encountered.

c) **Maintain Public Water Supply Supervision Program by maintaining a database management system (SDWIS) that accurately tracks the inventory (including routine updates of system information), violations and enforcement, sampling information and compliance determination for all safe drinking water contaminants.**

STATUS: Ongoing.

The Drinking Water Branch, Compliance Section, maintains SDWIS daily for inventory, sampling, violations and enforcement, legal entity, results and compliance determination. IDEM's SDWIS/state utilizes all current versions (including patches) and applications of SDWIS. The latest SDWIS 3.21 upgrade was installed March 2013.

CHALLENGES: No challenges encountered.

d) **Monitoring and reporting violations - All public water systems (PWSs) with violations will first receive a violation letter. Systems that do not correct the violation after receiving the violation letter will be referred to the Enforcement Section for appropriate actions consistent with agency policies and procedures.**

STATUS: Ongoing.

Monitoring and reporting (M/R) violation letters are issued monthly for all community water systems (CWS) and non-community water systems (NCWS) with a population greater than 1,000 for the total coliform rule (TCR) while quarterly M/R violation letters are issued for NCWS with a less than 1,000 population. For other rules M/R violations are issued within 30 days after the end of the monitoring period. If a public water system (PWS) meets IDEM's enforcement referral protocol (ERP) and/or U.S. EPA's Enforcement Response Policy (U.S. EPA ERP) and Targeting Tool, they will be referred to OWQ's Enforcement Section. The Drinking Water Branch maintains a list of all enforcement action referrals made and provides a monthly update to the OWQ Enforcement Section and U.S. EPA to ensure that commitments are made on track and on time.

CHALLENGES: No challenges encountered.

e) **Maximum contaminant level (MCL) violations - PWSs that report information will be in compliance with 95% of pre-1994 rule and 80% of post-1994 rule requirements annually.**

STATUS: Ongoing.

The MCL compliance rate for all PWSs has exceeded 95% of pre-1994 rule and 80% of post-1994 rule requirements. For FY13, the percentage of population served by community water systems that meets public health standards is 99.4%.

CHALLENGES: No challenges encountered.

f) Sanitary surveys at public water supply systems - Complete sanitary surveys at public water systems consistent with SDWA and as outlined in the ARDP.

STATUS: Ongoing.

The frequency of surveys during the period was generally consistent with the ARDP. As indicated under Challenges, staff turnover has hampered our efforts to complete all sanitary surveys within the time frames specified.

CHALLENGES: The loss of staff and staff turnover hampered inspection activities. Hiring and training staff continues to be a challenge.

Surface Water Quality Monitoring Strategy		**W-9**
Contact(s):a), b) & d) Marylou Renshaw & Cyndi Wagner, c) Chuck Bell	U.S. EPA Contact(s): Linda Holst, Mari Nord & Ed Hammer	Due Date: a)-d) Annually.
U.S. EPA Role: a) Provide assistance in revising monitoring strategy. Review and provide comments on draft and final products. Work with IDEM to implement the strategy and identify resources to address identified gaps. Work with IDEM to identify resources to address issues identified in the strategy and provide technical assistance/guidance as requested. Work with IDEM to identify portions of the strategy that could not be implemented and reasons why. Provide meeting support and travel support as available.		
Goal 2: Protect America's waters. **Objective 2.2: Protect and restore watersheds and aquatic ecosystems.** **Funding: Federal**		

a) Implement the 2011-2019 Water Monitoring Strategy in the 2011 and 2012 monitoring seasons. (U.S. EPA PAM WQ-5) IDEM will use the EnPPA update reporting procedures to provide information on progress, including the number of sites sampled, per basin, major rivers or basins surveyed, number of stations sampled, and types of data collected. IDEM will use the EnPPA update reporting procedures to provide information on progress, including the number of sites sampled, per basin, major rivers or basins surveyed, number of stations sampled, and types of data collected.

STATUS: Ongoing.

Targeted Baseline Watershed Studies: sampling at Plummer Creek's 33 sites were completed in June 2012. Little Calumet sampling at 46 sites began in November 2011, by the end of June 2012, eight of 12 months of sampling had been completed. Indiana-Kentucky sampling at 22 sites began in May 2012, by the end of June 2012; two of 12 months of sampling had been completed. Monthly monitoring was conducted at 163 Fixed Station sites around the state. Details for probabilistic monitoring are provided in W-1. Details for targeted projects are provided in W-2(b). Cyanobacteria sampling increased from 12 beaches at nine lakes in 2012 to 15 beaches at 13 lakes in 2013. Results of the sampling are posted on the website www.Algae.IN.gov. Following the final report by U.S. EPA R5 and Midwest Biodiversity Institute regarding monitoring design and analysis of the Plummer Creek baseline study data, IDEM made the following changes for targeted studies:

1) added macroinvertebrates as another biological indicator, 2) adjusted sites, parameters, and sampling frequency to meet watershed specific concerns, 3) began developing threshold values for key biological stressors by ecoregion to generate a watershed "report card" following analysis for specific biological stressors, and 4) began an investigation into the field collection methodology and taxonomic resolution for macroinvertebrate samples.

CHALLENGES: Reduced staffing levels put a stress on resources, but all of the work was completed. As noted in W-2(b) and time constraints for data analysis.

b) **Participate in regional monitoring newsletter, webinars and activities as resources allow.**

STATUS: Ongoing.

Managers and staff participate as time and resources allow.

CHALLENGES: No challenges encountered.

c) **IDEM will by June 2011 establish and then implement a regular schedule to upload water quality data to U.S. EPA R5 national STORET through an updated AIMS database.**

STATUS: Ongoing.

IDEM has established a regular schedule for uploading water quality data into STORET and Indiana surface water chemistry data that has completed the quality assurance process and is current through June 30, 2013.

CHALLENGES: Naming convention conflicts in organic compounds and biological community data sets are still being worked out between IDEM and U.S. EPA R5. As these issues are resolved, these data sets will be added to STORET.

d) **Provide separate, timely reports, as required by the grant agreements, on all activities funded by the monitoring initiative funds (specific activities identified in separate amended grant work plans including implementation of the national surveys and monitoring strategy activities).**

STATUS: Ongoing.

Semi-annual Reports were submitted to U.S. EPA R5 for WQ Monitoring Initiative grants # I965557-07, I965557-08, and I965557-09. All reporting is currently up to date.

CHALLENGES: Reports for the grant # I965557-07 (FFY07 through FFY08) were not submitted for the period July 2010 through December 2011 due to staff attrition and branch reorganization activities. Grant progress was updated and reported for that period on December 29, 2011. The first report for grant# I965557-09 (FFY10) was submitted a few months late due to an oversight on the due date since the grant award notice was received four months after the actual grant period start date.

Water Quality Standards (WQS)		**W-10**
Contact(s): a) Martha Clark Mettler, b) Shivi Selvaratnam, c) Paul Higginbotham	U.S. EPA Contact(s): Linda Holst, David Pfeifer, Kathy Mayo (anti-deg), Holly Wirick (UAAs) & Brian Thompson (nutrients)	Due Date: Ongoing.

U.S. EPA Role: Participate in the anti-degradation workgroup, use attainability analysis (UAA) discussions, and any nutrient workgroups or meetings, as requested by IDEM. Review draft IDEM work products and provide timely comments. To the extent that resources are available, assist IDEM with travel support for regional meetings (RTAG, WQS).

Goal 2: Protect America's waters.
Objective 2.2: Protect and restore watersheds and aquatic ecosystems.
Funding: Federal Water Quality Grants

IDEM will work to complete timely WQS revisions.

a) **Work with external stakeholders to complete revised anti-degradation implementation rulemaking. IDEM's goal is to have revised rule language primarily adopted by December 30, 2011.**

STATUS: Completed.

Indiana's Antidegradation Standards and Implementation Procedures rule was finally adopted by the Water Pollution Control Board (WPCB) on March 14, 2012. The final rule was filed by the Publisher of the Indiana Register on May 29, 2012. The rule became effective as a state rule on June 28, 2012.

CHALLENGES: This rule development was challenging with much contention from stakeholders. Thanks to U.S. EPA's letter of support, the rule was finally adopted after much debate by the WPCB.

b) **Implement nutrient criteria development plan (U.S. EPA PAMs WQ-1a and WQ-3a), participate in regional activities (Regional Technical Assistance Group (RTAG) meetings and conference calls), and provide U.S. EPA R5 with revisions to the nutrient criteria development plan by August 1 of each fiscal year (U.S. EPA PAM WQ-1b). IDEM's goal is to have rule language for a WQS for phosphorus in lakes at least preliminarily adopted by June 30, 2012.**

STATUS: Ongoing.

IDEM is working on implementing its nutrient criteria development plan and provides U.S. EPA R5 with revisions to the nutrient criteria development plan by August 1 of each fiscal year. Key staff participates in regional activities (Regional Technical Assistance Group [RTAG] meetings and conference calls) as time allows.

CHALLENGES: Concerns regarding implementation of the Total Phosphorus criteria for lakes and reservoirs have slowed progress in the development of draft rule language.

c) **Work collaboratively with U.S. EPA to establish guidance, policies, and procedures on timing of UAAs and components/characteristics of approvable proposed designated use changes for communities that are implementing long term control plans to address CSOs, and seeking or planning to seek CSO limited use designated uses.**

STATUS: Ongoing.

IDEM and U.S. EPA have had meetings/calls to discuss the UAA processes.

CHALLENGES: No challenges encountered.

d) **Work collaboratively with U.S. EPA and CSO communities, which are developing UAAs to support adoption of a wet weather limited use designation, to ensure that there is sufficient coordination, to minimize unnecessary duplication of effort, and to ensure the UAAs are consistent with state and federal requirements.**

STATUS: Ongoing.

IDEM and U.S. EPA have had meetings/discussions as well as correspondence with some CSO communities concerning UAAs and the documentation to support the UAAs that these communities will be submitting in the future.

CHALLENGES: No challenges encountered.

e) **Initiate scoping and establish a 3-year plan for the next complete triennial review of water quality standards.**

STATUS: Ongoing.

IDEM has initiated scoping and is working to establish a three year plan for the next complete triennial review of water quality standards.

CHALLENGES: Delays in progress on the antidegradation rule and lake nutrient rule have, in turn, delayed progress on work on triennial review as resources for WQS work are sparse.

Homeland Security

Homeland Security		H-1
Contact(s): Max Michael & Laura Steadham	U.S. EPA Contact(s): Roger Kanerva	Due Date: To be established.
U.S. EPA Role: Guidance and federal coordination.		
Goal 1: Taking action on climate change and improving air quality. **Objective 1.2: Improve air quality.** **Funding: Federal**		
Goal 2: Protect America's waters. **Objective 2.1: Protect human health.** **Funding: Federal**		

Assist in the coordination for preventing, protecting against, responding to and recovering from natural or man-made threats and events to people, property and the economy.

a) **Provide agency representation for the Indiana Counter Terrorism and Security Council (CTASC) as required by IC 10-19-8.**

STATUS: Ongoing.

IDEM's Commissioner, Tom Easterly attends these monthly meetings.

CHALLENGES: No challenges encountered.

b) **Support the coordination of counter terrorism activities performed by the CTASC for terrorist activities targeted at drinking water utilities and assist to improve the state's ability to respond to a terrorism incident at a drinking water facility.**

STATUS: Ongoing.

Support is provided by: conducting vulnerability assessments and emergency response plans as well as other approaches for protecting facilities that may be terrorist targets and providing feedback on their suitability; coordinating the application for and the distribution of any federal grant funds relating to security and anti-terrorism available to IDEM; and grant funds that flow through IDEM to drinking water and wastewater systems or any other eligible facilities.

CHALLENGES: No challenges encountered.

c) **Provide agency representation for the Indiana Emergency Response Commission (IERC). The IERC is required by the Superfund Amendment and Reauthorization ACT (SARA) Title III and the Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986 to maintain Title III records in Indiana with the local emergency planning committees.**

STATUS: Complete.

IDEM has been represented at all the IERC meetings during this EnPPA cycle.

CHALLENGES: No challenges encountered.

d) **Annually review and provide comments on the Indiana Strategy for Homeland Security.**

STATUS: Complete.

CHALLENGES: No challenges encountered.

e) **Participate in Homeland Security tabletop exercises.**

STATUS: Ongoing.

In addition to tabletop exercises, Emergency Response participates in other types of exercises as well. Emergency Response participated in an unannounced Emergency Operations Center staffing call out exercise on February 21, 2013. Emergency Response also participated in the September 22-27, 2013 State-Level Exercise entitled "Tipton Twister."

CHALLENGES: No challenges encountered.

f) **Continue to review and improve the state's incident debris plan and process as needed. In the event of a significant natural or man-made disaster, work with appropriate agencies to ensure the proper management and disposition of incident debris (including biological or infectious debris, and decontamination related waste) in a manner that is protective of human health and the environment.**

STATUS: Ongoing.

IDEM's involvement in the Clark County Tornado Response included implementation of the debris management plan, including the disposal of infectious debris and hazardous materials.

IDEM's role in debris management was incorporated into the Incident Command System at all levels including at the State Emergency Operations Center, the Incident Command Post and at the Group Supervisor Level of the Operations Branch in the field.

CHALLENGES: No challenges encountered.

g) **Incorporate new tools such as the Disaster Debris Recovery Network mapping tool and work with U.S. EPA R5 to ensure the information for Indiana faculties is regularly updated.**

STATUS: Ongoing.

IDEM coordinates with the Indiana Department of Homeland Security on improving the data available to IDEM during disaster situations, including GIS data. Emergency Response have been provided with iPhones, which has increased the ability to more effectively find GPS coordinates.

CHALLENGES: No challenges encountered.

Indiana Water/Wastewater Agency Response Network (INWARN)		**H-2**
Contact(s): Bruno Pigott, & Sherri Winters	U.S. EPA Contact(s): Roger Kanerva	Due Date: To be established.
U.S. EPA Role: Guidance and federal coordination.		
Goal 2: Protect America's waters. **Objective 2.1: Protect human health.** **Funding: Federal**		

The INWARN is a formalized system of members of the water/wastewater regulated community that have come together to address mutual aid during natural and man-made disasters.

a) **Support and assist drinking water and wastewater utilities, in developing and establishing INWARN to facilitate utilities accessibility to aid during natural and man-made disasters.**

STATUS: Ongoing.

Membership has increased to 100 members, an increase of 6% over last year. Progress is being made in getting smaller systems to join. Statewide workshops on defining need and appropriate generator needs were held last year and a new series is in progress this year. These workshops have helped get small and medium systems to see the advantage in joining. INWARN transitioned to a new web site that is more user-friendly and has expanded capabilities.

CHALLENGES: Small and medium systems continue to be reluctant to join.

b) **Support INWARN efforts, as requested, to market the INWARN mutual aid system to Indiana drinking water and wastewater utilities in order to maximize participation in and effectiveness of INWARN.**

STATUS: Ongoing.

Marketing is happening on a regular basis at professional association meetings, workshops, written media, and inspections. IDEM has joined with professional associations to help with the marketing and to show a united stand. Inspectors discuss emergency response plans during surveys and let systems know about INWARN and advantages to joining. Some natural disasters during the last year pointed out to systems the advantage to joining and generated new memberships.

CHALLENGES: One-on-one discussion seems to be the most effective way to get small systems to join. This is time consuming. Inspectors during surveys take advantage of the opportunity, but with survey schedules, this is not the most efficient way to reach small systems.

BioWatch		**H-3**
Contact(s): Dick Zeiler & Steve Lengerich	U.S. EPA Contact(s): Ralph Dollhopf	Due Date: To be established.
U.S. EPA Role: Guidance and federal coordination.		
Goal 1: Taking action on climate change and improving air quality. **Objective 1.2: Improve air quality.** **Funding: Federal**		

a) **Conduct BioWatch monitoring in Indianapolis at eight locations.**

STATUS: Ongoing.

Daily monitoring at eight BioWatch sites are continuing without any problems being encountered. Thirty-six air monitoring staff members are available for weekday and weekend rotation for BioWatch sample pickup scheduling.

CHALLENGES: No challenges encountered.

Office of Compliance Support

Reduction of Carbon Footprint and Toxic Chemicals		P-1
Contact(s): Rick Bossingham	U.S. EPA Contact(s): Jerri-Anne Garl	Due Date: See below.
U.S. EPA Role: Provide advice and guidance.		
Goal 4: Ensuring the safety of chemicals and preventing pollution. **Objective 4.2: Promote pollution prevention.** **Funding: Federal**		

a) Encourage local businesses and industries to reduce their carbon footprint through projects implemented by participating in voluntary recognition programs.

b) Reduce toxic chemicals by promoting waste minimization to businesses in Indiana.

STATUS for a) and b): Complete.

The Source Reduction Assistance Grant (SRA), also known as the Energy Management Grant, is complete and is closed out. The final report was submitted to U.S. EPA on December 29, 2011.

CHALLENGES: No challenges encountered.

Greening Facilities and Venues		P-2
Contact(s): Rick Bossingham	U.S. EPA Contact(s): Jerri-Anne Garl	Due Date: See below.
U.S. EPA Role: Provide advice and guidance.		
Goal 4: Ensuring the safety of chemicals and preventing pollution. **Objective 4.2: Promote pollution prevention.** **Funding: State**		

a) Provide technical assistance to community leaders in greening efforts. Primary focus will be working with the city of Indianapolis and athletic organizations as the city hosts the 2012 Super Bowl.

STATUS: Complete.

Indianapolis hosted Super Bowl XLVI in February of 2012. IDEM dedicated one full time staff member for a two year period to lead the Super Bowl Host Committee Environmental Programs, with additional support and technical assistance provided by IDEM's recycling programs. IDEM's staff member led the committee and facilitated all the Super Bowl greening efforts. The committee was made up of more than 50 members representing businesses, non-profits and governmental entities and worked with NFL and Host Committee staff to plan two years prior to Super Bowl XLVI.

The goal of the environmental programs was to reduce the environmental impact of the Super Bowl and to leave a positive lasting environmental impression in Indiana. The programs and projects included: 1st & Green; 2,012 Trees by 2012; Green Corps; Prepared Food Recovery; Recycling; and Composting and Materials Recovery.

The following results can be attributed to the environmental programs of Super Bowl XLVI:

- 2,888 trees planted through the 2,012 Trees by 2012 program.
- 1,402,681 pounds of CO_2 emissions reduced through the 1st & Green program.
- 2,555,754 gallons of water saved through 1st & Green.
- 65 environmental projects completed by Green Corps members throughout Indiana.
- 49,185 pounds of electronics collected for recycling by RecycleForce.
- 32 IndyParks parks and trails cleaned and refurbished during the Super City Clean & Green day.
- 32,987 items collected during the NFL's Super Kids-Super Sharing event, including 19,276 books, 3,557 pieces of sports equipment, and 10,154 school supplies.
- 181 boxes of clothing were donated to Goodwill Indy by Super Bowl volunteers.
- 357 pairs of new shoes were donated to Samaritan's Feet by Super Bowl volunteers.
- 144 tons of recyclable materials were collected from Super Bowl venues including Lucas Oil Stadium, the NFL Experience, and the Super Bowl Village.
- 46,000 pounds of prepared food was recovered by Second Helpings.
- More than five miles of decorative materials were recovered and donated.
- 15,000 megawatt hours of renewable energy were donated by Green Mountain Energy to offset the energy usage at Lucas Oil Stadium and other Super Bowl venues.
- Two tons of food were collected from the JW Marriott's main kitchen for composting.

The Super Bowl Village was held on reconstructed Georgia Street, a project developed as a part of the Sustainable Sites Initiative (SITES) program to make the area pedestrian only access. The Chase Near-Eastside Legacy Center was constructed with the goal of LEED Certification.

The U.S. EPA R5 also partnered with the Super Bowl Environmental Committees by providing technical assistance and support. U.S. EPA calculated that through the implementation of the Super Bowl environmental programs, greenhouse gases were reduced by 642 metric tons (1.3 million pounds), including:

- 500 metric tons from Super Bowl venue recycling.
- 57 metric tons from the three electronics recycling drives.
- 85 metric tons from 2,012 Trees by 2012 tree plantings (over the next five years).

A report, designed with the purpose of recording the environmental programs implemented during Super Bowl XLVI to share the results and be used as a road map for organizers of future large sporting and other events, was submitted to and approved by the XLVI Super Bowl Host Committee, shared with U.S. EPA R5 and is posted on IDEM's *Recycle Indiana* web site.

CHALLENGES: No challenges encountered.

Unwanted Medicines Disposal Guidance in Indiana		P-3
Contact(s): Rick Bossingham	U.S. EPA Contact(s): Jerri-Anne Garl	Due Date: See below.
U.S. EPA Role: Provide advice and guidance.		
Goal 4: Ensuring the safety of chemicals and preventing pollution. **Objective 4.2: Promote pollution prevention.** **Funding: State**		

a) Provide guidance for proper disposal of unwanted medicines and develop guidelines for collections conducted by law enforcement, solid waste management districts, pharmacies, municipalities, as well as local drug taskforces.

STATUS: Ongoing.

The unwanted medicines disposal program has shown great progress overall. In 2011, Indiana had 50 organizations participating, reporting 36,917 pounds of pharmaceuticals collected, and in 2012, 124 organizations collected at least 742,497 pounds of unwanted medicines, which ultimately were diverted from landfills and water sources. In addition, 25,394 containers were collected. Of those, 16,109 were prescription drug containers and 9,285 were a combination of over the counter and sharp containers. These collection numbers are largely due to permanent programs that have been implemented by law enforcement and Solid Waste Management Districts, and also through special events by the DEA, law enforcement, and the MARSH "Clean out your Medicine Cabinet" collections held twice annually. Information on the collection can be found at: www.marsh.net/pharmacy/clean-out-your-medicine-cabinet.

IDEM has provided several avenues for law enforcement, Solid Waste Management Districts, pharmacies, municipalities, local drug taskforces, and individuals to acquire information for the proper collection and disposal of unwanted medicines. IDEM's Unwanted Medicines webpage has several of these resources and is located at: http://www.in.gov/idem/recycle/2343.htm.

CHALLENGES: While the disposal program has shown improvement, Indiana has been declared with an epidemic of deaths due to prescription drugs.

In September 2012, the Attorney General's Office launched the Prescription Drug Abuse Task Force and IDEM participates on the Take Back Committee. The goal of the Rx Drug Abuse Task Force is to significantly reduce the abuse of controlled prescription drugs and to decrease the number of deaths associated with these drugs in Indiana. The task force will make recommendations for new rules, regulations, and state statutes and will publish a strategic comprehensive report of its findings. The Take Back Committee is focusing on collaborating with various entities to have a state-wide take back collection program.

Measurement of Solid Waste Diversion and Recycling		P-4
Contact(s): Rick Bossingham	U.S. EPA Contact(s): Jerri-Anne Garl	Due Date: See below.
U.S. EPA Role: Provide technical assistance and lend support to accomplish this goal.		

Goal 4: Ensuring the safety of chemicals and preventing pollution.
Objective 4.2: Promote pollution prevention.
Funding: State

a) **Continue to research and consider measurement options that will enable IDEM to accurately report the amount of solid waste that is diverted from disposal or recycled. Provide comment to the U.S. EPA on the development of a national measurement methodology for solid waste recycling. Consider participation in pilot or demonstration projects to evaluate measurement systems.**

STATUS: Ongoing.

IDEM staff participated in a conference call with U.S EPA R5 to discuss the draft report, "Economic Impact Assessment for End-users in R5 States." The report identifies manufacturers in the region that use recycled feedstock and demonstrates recycling markets. A list of Indiana manufacturing companies and draft definitions to help clarify manufacturers and processors of recycled materials were compiled and sent to U.S. EPA R5.

Other reports to help establish baseline metrics and assess the Indiana recycling industry were also completed and posted on the IDEM website. They include the following:

- A report from the Indiana Recyclable Materials Market Directory was developed. Key information is given that shows the company name, county location and facility address, contact information, business sector (broker, processor, manufacturer), and the type of primary recycled material accepted.
- IDEM staff completed an in-depth review of Purdue University-Calumet's, "Municipal Solid Waste Characterization Study for Indiana." A revised draft with updated Indiana 2008 MSW disposal data was approved by the Indiana Recycling Market Development Board.
- IDEM agreed to participate in U.S. EPA's State Measurement Program, a new on-line reporting and measurement template (Re-TRAC Connect) that establishes baselines for waste generation and recycling numbers. Data from IDEM's 2012 Solid Waste Facilities Reports are being reviewed and queried for initially responding to U.S. EPA's request. The next version of the reporting template will be released in June 2014 (to collect 2013 data).
- Staff completed a guidance document, "Indiana Waste and Recycling Metrics," and sent to U.S. EPA R5 (Susan Mooney) on May 1, 2013 for review. Details were given on development of a measurement methodology for solid waste recycling.
- Staff answered survey questions from U.S. EPA about sustainable materials management practices and recycling definitions with regard to Indiana. State information was given for U.S. EPA Fact Sheet, "Defining and Measuring Solid Waste Recycling and Disposal," which was published in August 2013. Other correspondence summarized program funding sources and distribution for Indiana solid waste and materials management.

- Staff participated in conference calls with U.S. EPA R5, Mid-America Council of Recycling Officials (MACRO), and other states to discuss waste and recycling metrics using the Re-TRAC web-based reporting format. Other discussion topics include state recycling issues, beneficial use programs, and best practices. Also, emerging technologies for recyclable materials and solid waste conversion were researched via industry updates from Waste and Recycling News, Resource Recycling, Indiana Inside Edge, American Institute of Chemical Engineers (AIChE) Web Forums, U.S. EPA reports, and other references.
- Indiana Solid Waste Management Districts are now required per Indiana code to report and publish the total amount of solid waste (in tons) disposed of and the total amount of recycling (in tons) carried out in the district in the year for which the district is directly responsible.
- An agency position was adopted with regard to renewal of Indiana Solid Waste Management Plans.

CHALLENGES: Caution should be noted when comparing state waste generation numbers and U.S. EPA national waste characterization information. Methodologies are not the same. Definitions and reporting requirements are not consistent between states. Also, recycling and diversion activities are broad-based and may include metrics that are beyond IDEM's control to effectively measure. Programs/issues include sustainable materials management, value-added benefits, solid waste hierarchy, extended producer responsibility (EPR), pay-as-you-throw, bottle bills, zero-waste, waste diversion, recycling rate, materials banned from landfills, and other goals. Additional efforts are needed in the next year to collaborate with U.S. EPA R5 on sharing ideas, questions, and any concerns about the State Measurement Program and searching for applicable state data that is available. Also, discussions are on-going about increasing the amount of recycled commodities available for in-state manufactures and releasing funding for the Recycling Market Development Program.

Demonstration Water Preservation and Pollution Prevention in Indiana—2011 P2 Grant Project		P-5
Contact(s): Rick Bossingham	U.S. EPA Contact(s): Jerri-Anne Garl	Due Date: See below.
U.S. EPA Role: Provide advice and guidance.		
Goal 4: Ensuring the safety of chemicals and preventing pollution. **Objective 4.2: Promote pollution prevention.** **Funding: Federal**		

a) Demonstrate measureable reductions in water usage and water pollutants while achieving cost savings at participating entities. These reductions will be achieved by the implementation of a process for identifying water preservation and pollution prevention opportunities at participating industrial facilities.

STATUS: Complete.

The Water Preservation & Pollution Prevention Program (WP4 Grant)

EPA # PPG-B698543212 has been completed. The final report was sent to U.S. EPA R5 on September 20, 2013.

CHALLENGES: In retrospect, the decision to include this grant in the PPG was ill informed. This decision precluded our ability to receive a "no cost" extension and required extensive efforts to expedite the process and force the grant to fit into the PPA time frame. This created unnecessary chaos and additional burdens on staff time. When possible, future similar grants should not be included in the PPA.

Environmental Justice (EJ)		P-6
Contact(s): Rick Bossingham	U.S. EPA Contact(s): Lara Lasky	Due Date: See below.
U.S. EPA Role: Provide advice and guidance.		
Goal 3: Cleaning up communities and advancing sustainable development **Objective 3.3: Promote sustainable and livable communities.** **Funding: State**		

a) Framing EJ with sound science (fact-based decision making) and sound policy (the Constitution's equal protection clause) and aiding all communities to make informed decisions about their environment, health and well-being. IDEM is in a position to provide leadership in EJ policy development based on IDEM's principle that "All Hoosiers deserve clean air, water and land."

STATUS: Ongoing.

IDEM uses a variety of resources and tools available to monitor the entire state and compare areas that have economic or social indicators noted in such programs as EJView to make sure areas do not become overburdened with environmental challenges. Office of Land Quality uses EJView to generate facility specific demographic and health data reports, primarily for PCB inspections, which are referred to U.S. EPA. Office of Air Quality is committed to working with U.S. EPA to evaluate "high risk facilities" identified by the 2005 National Air Toxics Assessment (NATA). In general, IDEM discusses the availability of Supplemental Environmental Projects (SEPs) as part of enforcement penalty negotiations. Office of Air Quality staff completed a detailed evaluation of air quality along the Indiana Lakeshore, including where high risk facilities were located. The majority were under the health based limits in the identified EJ geographic areas. The study discovered that mobile sources were the primary concern and a few industries in those EJ areas were above risk levels. These facilities have SEPs and other modifications now in place, which should reduce emissions and risk, but will continue to need to be monitored.

CHALLENGES: No challenges encountered.

b) Reviewing U.S. EPA's "Plan EJ 2014" for advancing environmental justice across the agency—comparing and integrating federal with state initiatives when feasible.

STATUS: Ongoing.

A review of U.S. EPA's Plan EJ 2014 was completed.

CHALLENGES: IDEM is awaiting further guidance from U.S. EPA identifying the states' role in their EJ plans, including resources that might be available. IDEM will continue to participate in U.S. EPA's monthly conference calls with the states, communicating U.S. EPA progress with EJ.

c) Reviewing grant and cooperative agreement opportunities to better focus IDEM's EJ outreach initiatives to local communities on targeted issues.

STATUS: Ongoing.

IDEM's grant director reviewed Plan EJ 2014. IDEM's EJ website also provides links to U.S. EPA's federal site for the latest funding announcements.

IDEM also indirectly promotes state grant opportunities to communities which may have EJ issues. IDEM's Recycling Market Development Program (RMDP) provides assistance with the development of green jobs. The agency also works with the Indiana Finance Authority which provides links to announcements on grants such as Brownfield Revolving Loan Fund, and Workforce Development and Job Training grants.

CHALLENGES: IDEM's grant director position now resides in another office within IDEM, no longer with the Office of Compliance Support.

d) Updating IDEM's website section on EJ.

STATUS: Ongoing.

Updates were made to IDEM's website section on EJ in June 2011. The newly updated GIS based map utilizing 2010 Census information is for internal use only. Links regarding funding or other EJ updates are available through U.S. EPA's website, including *Plan EJ 2014* and progress reports.

CHALLENGES: No challenges encountered.